

Third Party Code

Sandoz Global Policy

Document Owner: Legal & Compliance
Version: 2.0

1. INTRODUCTION & SCOPE

Sandoz is committed to ethical business practices and responsible operations. This Code sets forth certain minimum obligations that third parties, including but not limited to suppliers, customers, and others must adhere to when conducting business with Sandoz. Any questions regarding the principles and obligations set forth in this Code can be addressed to Sandoz at ThirdPartyCode@sandoz.com.

2. COMPLIANCE WITH LAWS & REGULATIONS

As a third party engaging with Sandoz you must operate in full compliance with all applicable national and international laws and regulations relevant to your industry. This includes, but is not limited to, laws and standards governing human rights, labor, environmental protection, anti-bribery and anti-corruption, data privacy, the use of artificial intelligence (AI), information security, trade sanctions, and competition. You must also adhere to internationally recognized frameworks such as the UN Guiding Principles on Business and Human Rights (2011), the Ten Principles of the UN Global Compact, the International Labour Organization (ILO) Fundamental Conventions and, if applicable to you, the OECD Guidelines for Multinational Enterprises. All applicable laws and standards referenced herein shall apply in your relationship with Sandoz irrespective of their legal status or enforceability in the jurisdiction of your incorporation or operations.

2.1 LABOR & HUMAN RIGHTS

You must uphold internationally recognized human rights and labor standards in all business activities. Forced labor, child labor, human trafficking, and any form of modern slavery are strictly prohibited in accordance with ILO Conventions 29 (Forced Labor, 1930), 105 (Abolition of Forced Labor, 1957), 138 (Minimum Age, 1973), and 182 (Worst Forms of Child Labor, 1999). Your employment practices must be free from discrimination (ILO Conventions 100 and 111), and workers must be treated with dignity and respect. Fair wages, reasonable working hours, and safe working conditions must be provided by you in accordance with applicable labor laws. Workers must have the right to freedom of association and collective bargaining where legally permitted (ILO Conventions 87 and 98).

2.2 HEALTH & SAFETY

You must comply with the occupational health and safety obligations under applicable laws of the place of employment and actively control the risk of accidents at work or work-related health hazards. This includes maintaining sufficient safety standards in the workplace, in work equipment, and in related process control devices.

Based on risk assessments, you are required to implement protective measures to avoid exposure to chemical, physical, or biological substances, including but not limited to active pharmaceutical ingredients. You must also establish effective emergency preparedness and response planning appropriate to the level of risk and organize work in a way that prevents excessive physical and mental fatigue by ensuring reasonable working hours and rest breaks.

In addition, hazard information, training, and employee instruction must be provided as required by applicable laws and tailored to promote a strong safety culture.

2.3 ENVIRONMENTAL RESPONSIBILITY

You must comply with all applicable environmental laws and take proactive measures to minimize your environmental impact. Your business operations must be conducted in a manner that

reduces pollution, waste, water usage, greenhouse gas (GHG) emissions, and excessive consumption of natural resources.

Any waste, wastewater, or emissions – including but not limited to active pharmaceuticals with potential risks to human or environmental health – must be appropriately managed, controlled, and treated prior to release into the environment.

Hazardous materials and waste disposal must be managed responsibly to prevent harm to human health and the environment. You must comply with the Basel Convention on Hazardous Waste (1989), the Stockholm Convention on Persistent Organic Pollutants (2001), and the Minamata Convention on Mercury (2013).

You must monitor and reduce your GHG emissions and support your supply chain in doing the same. You must design for circularity, enhance resource efficiency, minimize reliance on non-renewable inputs, and adopt reuse and recycling practices wherever feasible. Additionally, you must assess and mitigate your impact on biodiversity, reducing your ecological footprint wherever possible.

2.4 ETHICAL SOURCING & RESPONSIBLE MINERALS

You must ensure responsible sourcing of materials and avoid procuring goods that contribute to human rights violations or conflicts.

In particular, you must avoid sourcing raw materials – such as tin, tantalum, tungsten, and gold (3TGs) as well as other minerals from conflict-affected regions – from conflict-affected or high-risk areas where extraction contributes to human rights abuses, corruption, armed group financing, or other serious harms in line with the OECD Due Diligence Guidance for Responsible Mineral Supply Chains (latest version) and the U.S. Dodd-Frank Act Section 1502 (2010). You must ensure transparency throughout your supply chain, from the point of extraction to final delivery, and maintain responsible sourcing practices.

2.5 ANIMAL WELFARE

To the extent that you are involved in research, production, or other activities requiring animal testing you must comply with all applicable ethical animal welfare standards. Alternatives to animal testing must be prioritized whenever scientifically valid and legally permissible. Where animal testing is necessary, you must ensure that such testing is conducted in compliance with all applicable laws and ethical guidelines, including but not limited to the U.S. Animal Welfare Act (1966) and the European Directive 2010/63/EU on the Protection of Animals Used for Scientific Purposes.

2.6 ANTI-BRIBERY & ANTI-CORRUPTION

You must uphold the highest standards of integrity and transparency in all business dealings in line with the United Nations Convention Against Corruption (UNCAC, 2003), the OECD Anti-Bribery Convention (1997), the U.S. Foreign Corrupt Practices Act (FCPA, 1977), and the UK Bribery Act (2010).

Any form of bribery, corruption, or facilitation payment – whether offered, promised, made, or accepted, directly or through a third party – is strictly prohibited. Gifts, hospitality, and other benefits must not be offered or accepted where they could improperly influence business decisions or create the appearance of undue influence.

You must maintain accurate books and records and implement an effective anti-bribery program. Such program must include, at a minimum, a written policy promoting ethical business conduct and zero tolerance for illegal behavior, including but not limited to bribery and corruption, regular

anti-bribery trainings to all employees, a process to report misconduct, and a due diligence on any subcontractors or suppliers engaged in work related to Sandoz.

2.7 FAIR COMPETITION

You must ensure that you engage in fair competition, avoiding anti-competitive practices such as price-fixing, market manipulation, or unfair trade restrictions, as required by national and international competition laws.

2.8 TRADE COMPLIANCE

You must comply with all applicable trade sanctions and export control regulations, including but not limited to the U.S. Office of Foreign Assets Control (OFAC) Sanctions, the EU Consolidated List of Sanctions, and the UK Sanctions and Anti-Money Laundering Act (2018). Engaging with individuals, entities, or countries subject to trade restrictions is strictly prohibited.

2.9 ANTI-MONEY LAUNDERING & COUNTER-TERRORIST FINANCING

You must not engage in or facilitate money laundering or the financing of terrorism. You must implement appropriate internal controls and procedures to detect and prevent transactions that could be linked to criminal activity or terrorist organizations. Compliance with all applicable anti-money laundering (AML) and counter-terrorist financing (CTF) regulations is mandatory, including but not limited to the Financial Action Task Force (FATF) Recommendations, the EU Anti-Money Laundering Directives (AMLD), the U.S. Bank Secrecy Act (BSA), and the UK Money Laundering Regulations. Where required by such regulations, you must implement (i) an effective AML program that includes robust Know Your Client (KYC) processes to verify the identity and integrity of customers, suppliers, and other business partners; (ii) an enhanced due diligence for high-risk jurisdictions, politically exposed persons (PEPs), and complex ownership structures; as well as (iii) any other controls necessary to mitigate relevant risks. You must promptly report any suspicious activity to the competent authorities and cooperate fully with them. In addition, you must immediately inform Sandoz of any actual or suspected AML/CTF breach and ensure full cooperation with audits and investigations.

2.10 DATA PRIVACY

You must carry out the processing of personal data in compliance with applicable data protection laws including but not limited to the EU General Data Protection Regulation (GDPR, 2016) and other relevant national data privacy laws and solely for the purposes specified in the relevant engagement and as further instructed and documented by Sandoz, including with regard to transfers of personal data to a third country.

2.11 INFORMATION SECURITY

You must implement and maintain an information security program that adheres to industry-recognized standards and best practices and complies with all applicable local and regional cybersecurity laws and regulations (e.g., the EU NIS2 Directive). The program must protect your systems and network infrastructure, and ensure the confidentiality, integrity, availability, and resilience of data.

2.12 USE OF AI

You must develop and/or deploy AI systems with transparency, accountability, fairness, and human oversight, ensuring appropriate governance in accordance with applicable laws (e.g., the EU AI Act). You must support Sandoz in providing any legally required documentation.

3. CONFLICTS OF INTEREST

You and your workers and/or suppliers, especially those performing tasks on behalf of or for Sandoz, must avoid situations in which personal, financial, or other interests could conflict with your duties and responsibilities in your business relationship with Sandoz. Any actual, potential, or perceived conflicts of interest must be disclosed to Sandoz without delay. This includes, but is not limited to, business relations (own business, other ownership interests), close personal relationships, or other arrangements that could compromise objectivity or decision-making. You must maintain transparency in all dealings and take steps to ensure that your decisions are based solely on merit and the best interests of the business relationship.

4. BUSINESS CONTINUITY & DISRUPTION RISK MANAGEMENT

To the extent that you are engaged in manufacturing, supply chain, or service provision for Sandoz you must have business continuity and crisis management plans in place. These plans must be based on thorough risk and impact assessment and must ensure that critical operations and services can continue in the event of disruptions, including but not limited to natural disasters, cyber threats, or supply chain interruptions. You must periodically review, test and update these plans and, where requested, cooperate with Sandoz in ensuring supply chain resilience.

5. REPORTING & ACCOUNTABILITY

You must establish effective mechanisms to identify and report legal or ethical concerns within your operations. Any violation of this Code, or of any applicable law, must be promptly addressed. Suspicious activity must be reported without delay to the appropriate authorities in accordance with legal requirements.

Sandoz reserves the right to conduct audits and assessments to verify your compliance with this Code. To support such verification, you must, upon reasonable request, provide Sandoz with information and documentation in the form requested to confirm your adherence to this Code.

6. ACKNOWLEDGMENT

By engaging with Sandoz, you acknowledge and confirm your commitment to comply with this Code and all applicable legal requirements. Failure to meet these standards may result in corrective actions, including but not limited to suspension or termination of the business relationship by Sandoz.

7. REVIEW AND REVISION

This Code will be reviewed by Sandoz annually or more frequently if required due to legal or regulatory developments. Each new version of this Code will be reviewed and formally approved by the Sandoz Legal & Compliance function before publication.

8. DOCUMENT HISTORY

| Version | Change(s) |
|---------|--------------------------------|
| 1.0 | First version 2023 |
| 2.0 | Revised version 1 January 2026 |