

# AstraZeneca Code of Ethics

## Values, Behaviours, and Policies

Our Code of Ethics defines our values at work and guides our behaviours to deliver life-changing medicines



### We Follow The Science

- I am curious about science and proactively develop my knowledge
- I ensure that scientific and business decisions are based on strong science
- I seek partners and collaborators that share our passion for science



### We Play To Win

- I prioritise relentlessly and make the right strategic choices to win now and in the future
- I set high standards for myself and others, making courageous choices to ensure success
- I attract great talent and develop my employees, to build strong winning teams
- I leverage the strengths and diversity within and beyond AZ to create value



### We Put Patients First

- I hold myself and others to account for making decisions in the best interests of patients
- I think of patients as people and tailor solutions and approaches to meet their needs
- I seek to understand the healthcare environment and external trends



### We Do The Right Thing

- I do the right thing and act with integrity, even when it is difficult
- I take personal accountability for my actions and for the success of AZ as a whole
- I persistently challenge actions or decisions that are not aligned with our values
- I speak the truth, including dissenting views and hard feedback, even when it is uncomfortable
- I treat my colleagues with respect and candour



### We Are Entrepreneurial

- I act with urgency, take smart risks and learn from both success and failure
- I am resilient and relentless in pursuit of excellence
- I collaborate with colleagues internally and externally to think differently in seizing opportunities
- I always seek to simplify work



### Global Policies

- Our Science
- Our Interactions
- Our Workplace
- Our Sustainability



## ASTRAZENECA GLOBAL POLICY: OUR SCIENCE

### Why It Matters

Science is at the core of everything we do; it is the heart of our business and our values. We push the boundaries of science to discover innovations that transform and sustain health.

By leading in science, we improve the lives of patients around the world.

### How We Do It

**We conduct innovative research, development, and manufacturing to high standards of ethics and integrity everywhere we operate. We follow the laws, regulations, codes, guidelines, and good practice standards related to safety, quality, research, and bioethics to deliver work which is not only legal but also ethically justified.**

- We are dedicated to patient safety, and we maintain controls to ensure the safety, efficacy, and quality of our products throughout their lifecycle.
- We identify, report, and address issues affecting people, products, or processes, including adverse events, to ensure accurate safety profiles.
- We follow relevant informed consent procedures and protect personal data.
- We design clinical programmes to maximise potential benefits for our intended patient populations while minimising risks.
- We support such principles as the Declaration of Helsinki and the Convention on Biological Diversity and adhere to the Nagoya Protocol.
- We perform investigations using human biological samples, including, by exception, human embryonic stem cells and other fetal tissue, to further understanding of diseases, improve diagnosis, and develop new treatments.
- We are diligent about safe use and containment of genetically modified materials, including human and animal cells, animals, and other organisms.
- We carefully consider our use of animals in research and apply a single global standard. We apply the 3Rs (Replacement-Reduction-Refinement) and are open about our work. We do not use Great Apes or wild-caught primates.

**We register our clinical and observational studies, post study results on disclosure websites, and make a good faith effort to publish our results in peer-reviewed journals, all in a timely way to demonstrate transparency.**

- We share our study results even if they are unfavourable to us.
- We follow Good Publications Practice guidelines and ICMJE Recommendations in sharing objective, meaningful scientific information about our studies without compromising our intellectual property.

**We support externally sponsored scientific research to advance science and contribute to the development of better medicines for patients, not to promote our products.**

**We hold ourselves accountable for the quality and conduct of science carried out on our behalf by third parties.**



## ASTRAZENECA GLOBAL POLICY: OUR INTERACTIONS

### Why It Matters

Delivering the next generation of medicines depends on our going wherever science leads us. Scientific advancements that make a difference are built on integrity at every stage of development and at every level of the company.

Maintaining integrity and living our values in all of our interactions protects our science, upholds our reputation, and builds public trust.

### How We Do It

#### **We run every part of our business with integrity, honesty, and transparency everywhere we operate.**

- We refuse to tolerate bribery or any other form of corruption, even if we lose business. We do not improperly influence the decisions of others or allow ourselves to be improperly influenced, through the exchange of money, favours, or anything else of value. We avoid any activity that could even look like improper influence.
- We ensure that our personal interests and relationships do not create conflicts of interest or even appear to influence our professional judgment.
- We respect and protect privacy by collecting, using, retaining, sharing, and/or disclosing personal data fairly, transparently, and securely.
- We do not allow modern slavery or human trafficking anywhere in our business.
- We do not allow insider trading.
- We compete fairly and legally.
- We follow trade controls requirements.
- We participate in public policy and political activities responsibly.
- We choose timely transparency about our interactions and payments.
- We do not facilitate or condone tax evasion.
- We do not misrepresent who we are.
- We uphold our standards of integrity in every situation, not allowing, asking, or enabling others to engage in prohibited conduct on our behalf.

#### **We communicate truthfully and responsibly about our business.**

- Our promotional and non-promotional communications and activities are accurate, not misleading, fair, balanced, and supported by scientific evidence.
- We only promote approved products and only for their approved uses.
- We educate healthcare professionals on both the risks and the benefits of our products so that they can make the best treatment decision for each patient.
- We engage with patients to learn their needs so we can address them.
- We participate in social media and other online communities responsibly.

**We work only with qualified third parties who have a commitment to ethics and integrity consistent with ours and only when we genuinely need them. We pay what is fair and just for the work they do.**



## ASTRAZENECA GLOBAL POLICY: OUR WORKPLACE

### Why It Matters

We aim to provide a great place to work where people feel respected, supported, and safe so that our diverse, uniquely talented employees are free to drive innovation. We value strong teams who are passionate about pushing the boundaries of science.

Maintaining our workplace as a secure business environment supports and protects our people, assets, and reputation, and minimises losses and disruption.

### How We Do It

**We promote a culture of diversity, respect, and equal opportunity, where individual success depends only on personal ability and contribution to the company.**

- We treat others with fairness, integrity, honesty, courtesy, consideration, respect, and dignity, regardless of gender, race, nationality, age, sexual orientation, or other forms of diversity.
- We promote an inclusive environment where everyone can perform their best.
- We make decisions about recruitment, hiring, reward, development, and promotion based only on ability, experience, behaviour toward others, work performance, and demonstrated potential in relation to the job.
- We develop employee talent and support everyone in achieving their potential.

**We depend on open and courageous conversation to keep our fast-paced business aligned with our values and to ensure we address and learn from our mistakes.**

- We accept accountability for identifying and reporting any conduct suspected to be inconsistent with our values or policies so that our company may continue to serve patients. We can report anonymously if we feel we need to.
- We report concerns in good faith, and we do not tolerate retaliation.

**We promote and maintain a safe, healthy, secure work environment.**

- We use effective safety, health, and environment (SHE) management systems to identify and manage risk and maintain strong SHE performance.
- We only work with others who embrace SHE standards consistent with ours.

**We make the best use of the company's assets and protect the integrity of our property, including technology and systems, to further our science.**

- We manage assets efficiently and effectively so that the company gets the benefit of their full value.
- We manage and report risks to company assets, employees, or patients to protect people, the company, and shareholder value.



## ASTRAZENECA GLOBAL POLICY: OUR SUSTAINABILITY

### Why It Matters

We are in the business of creating and delivering treatments in a way that promotes health and secures the future of the company, society in general, and our planet.

Our vision and mission to deliver lasting value depend on our making decisions every day that support our long-term existence as a company worthy of public trust.

### How We Do It

**We follow the laws, regulations, codes, guidelines, and standards that apply to us in every part of our business everywhere we operate.**

- We make clear in our values, policies, and training that obeying the law and working ethically are basic, non-negotiable responsibilities for all of us and everyone else who acts on our behalf.

**We maintain robust financial, regulatory, and operational controls.**

- We do not tolerate fraud and will take all reasonable steps to keep from becoming a victim of it.
- We document our business decisions and supporting rationales truthfully and completely.
- We use control systems to identify and manage risk and maintain strong performance.
- We have plans set to maintain critical processes in case of a significant event.
- We maintain accurate company books and records.

**We operate in an environmentally responsible manner.**

- We work to minimise our reliance and impact on natural resources and promote environmental sustainability.
- We work to minimise the environmental impact of our products from discovery to disposal.

**We work to improve health and quality of life and to promote the value of science.**

- We explore ways to improve access to healthcare and the patient experience to meet diverse patient and family needs and provide lasting health benefits.
- We make charitable donations and other contributions for scientific, educational, or charitable purposes to support health or healthcare systems, medical or scientific education, advances in medical or scientific research, and disaster relief.
- We aim to protect patients from the dangers of illegally traded medicines by working with partners around the world to disrupt such activity.

## Why Does The Code Of Ethics Matter?

We have a Code of Ethics to communicate the values and principles we are expected to consistently apply as we represent AstraZeneca every day, in every job, in every country where we operate.

Our Code and supporting global requirements give us tools to work in line with the laws, regulations, industry codes, guidelines, and standards that apply to us around the world. We follow our own Code and requirements, even in markets where the rules may be less strict. Since our global requirements form the baseline for our standards of ethical behaviour, local and business-unit requirements may only differ from them when they are stricter.

Following the Code and supporting requirements (together, “the Code”), we deliver lasting benefits to patients and other stakeholders. We achieve success responsibly. We earn and keep trust. We are proud of where we work.

## Who Must Follow The Code?

All of us. We are all accountable for upholding the Code. Managers are also responsible for helping their teams understand and apply it. And we choose to work only with third parties whose ethical standards are consistent with ours so that AstraZeneca’s high standards will carry through any work done in our name.

## How Do We Make Decisions Using The Code?

Our Code cannot cover every situation or replace good judgment. It informs us so that we can decide for ourselves. If you are having difficulty with a decision, ask yourself:

- Why am I making this decision?
- Is it aligned with AZ’s values and principles?
- Would my manager and I like reading about it in tomorrow’s news?

If you have a question about our Code, ask. Your manager and your local Compliance, Legal, and HR partners are here to help.

## What If Something Goes Wrong?

People—and companies—learn from mistakes. If you see or suspect something is wrong, report your concerns. We all have a right and a duty to speak up so the company can correct and learn. AZ does not tolerate retaliation against anyone who makes a report in good faith. The company will fully investigate reports of non-compliance with the Code and take proper disciplinary action, which may include termination, depending on the circumstances.

To make a report, talk with your manager first. If you are uncomfortable with that, contact your Human Resources, Legal Department, or Compliance representative. If you prefer to contact someone outside of your business unit or marketing company, use any of the resources listed below. Every effort will be made to protect confidentiality. You may report anonymously if your local laws allow.

**AZethics** AZethics.com or telephone (see below for numbers)

**From the UK** 0800 0328483

**From China (Southern)** 10-800-120-1239

**From the US** 866 993 8442

**From China (Northern)** 10-800-712-1239

For other countries, check AZethics.com for local numbers. If you cannot access the web, or if your country is not listed, call + 1 503 748 0641. Tell the call centre you are from AstraZeneca and state what language you prefer.

AZethics is managed by an independent third party on AstraZeneca’s behalf.

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