
Expectations of Third Parties

Working with AstraZeneca

April 2022



At AstraZeneca, our clear company values guide our behaviour and our decisions every day, helping us act with integrity and do the right thing in every situation.

We work with third parties whose ethical standards are consistent with ours, so that AstraZeneca's high standards carry through any work done in our name. Only together can we maintain and enhance the trust of our customers and stakeholders and, ultimately, deliver our purpose: *To push the boundaries of science to deliver life-changing medicines."*

Pascal Soriot CEO
AstraZeneca



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We do the Right Thing

One of AstraZeneca's values is that we do the right thing, and that informs every aspect of how we do business, including how we choose and work with third parties.



This document summarises what AstraZeneca believes is required to do the right thing and what we expect of all third parties that work with us, for us, or on our behalf. In addition to the basic requirements to follow the law and act with integrity, these expectations are part of our fundamental commitment to work only with others who embrace ethical standards consistent with ours.

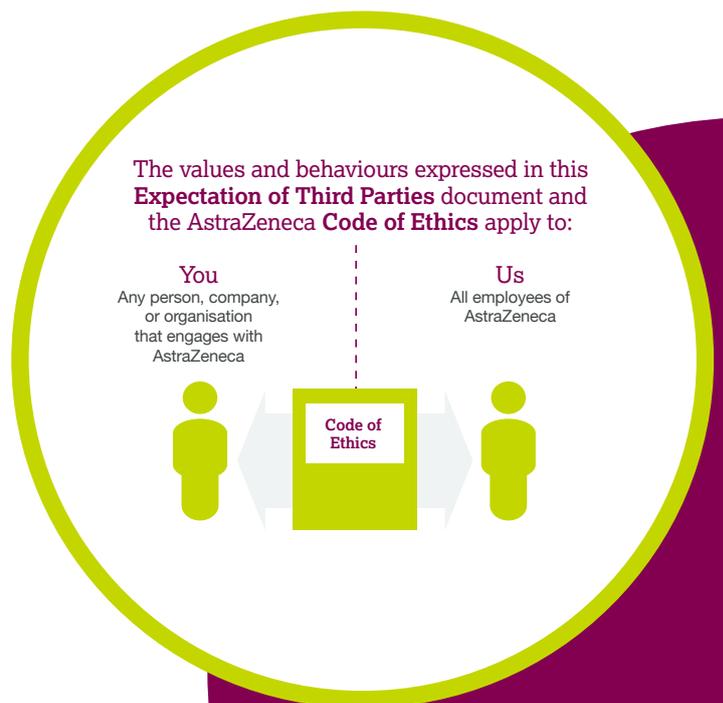
Before we contract with third parties, we assess them to determine whether their reputation and behaviour align with our expectations. We actively oversee our relationships to ensure third parties continue to maintain high standards, and we address any concerns or changes.

We appreciate that you have your own company values and may have developed your own policies. Even so, we ask you to take the time to understand our expectations and make sure yours are consistent with ours, and we expect you to hold your own third parties to equally high standards.

You are free to determine how you will meet the expectations in this document although, in certain highly sensitive areas, we may expect you to follow our policies and standards exactly. If so, we will specify those in writing.

Because we value the power of diversity, we ask you to promote and build an inclusive workforce in your own organisation and a diverse and inclusive supply chain through your procurement practices.

We commit to you that you will get the support you need from AstraZeneca to do the right thing if you identify practices or behaviours that fall short of these expectations. Details about **raising concerns** are at the end of this document.



Working Together

At AstraZeneca, health is our business and our contribution to society. How we operate supports sustainable ecosystems for healthcare that benefit people and our planet through science-based innovation.

Our aspiration is for the future to be healthy and for us to be an active participant in a healthy society, planet, and business. Our pioneering medicines touch the lives of millions of people, so it is a business imperative that we are partners and advocates for solutions to global health. At the heart of our sustainability approach is access to healthcare and its connection to environmental protection and ethics and transparency.

To scale our collective impact, we work closely with our key partners on sustainability opportunities and challenges, creating a learning network to raise the visibility of responsible business practices and make positive social, economic, and environmental impact.

As a member of the Pharmaceutical Supply Chain Initiative (PSCI), AstraZeneca supports the **PSCI Principles for Responsible Supply Chain Management**. These principles, which are integrated into this document, outline industry expectations of the supply chain in ethics, human rights and labour, health and safety, environment, and related management systems.



Ethics

We expect you to conduct business ethically and with integrity and to make sure your own third parties do the same.

Anti-Bribery and Anti-Corruption

Make sure you have systems, procedures and other appropriate controls in place to prevent bribery and corruption. *Corruption* means abusing entrusted power for private gain. *Bribery* is a form of corruption involving the exchange of money or something else of value to induce or reward behaviour that is unethical, illegal, or a breach of trust.

Never engage in or tolerate bribery or any other form of corruption. We will support all refusals to engage in bribery or corruption, even if it means losing business.

Never give, offer, promise, receive, ask for, or agree to accept a bribe, and never authorise someone else to do so on your behalf.

Never make a facilitation payment unless you reasonably fear for your safety. Report any requests for facilitation payments as soon as possible to AstraZeneca, regardless of whether you paid the demand.

Give appropriate items of value, hospitality, or contributions on behalf of AstraZeneca, or make payments on our behalf, only as specified in our contract with you, and keep good records of these activities. You might be required to provide those records to us.

Never make payments in cash or cash equivalents (for example, gift cards or restaurant vouchers), and never give gifts or any political support (money or resources), on our behalf.

Our Anti-Bribery and Anti-Corruption Global Standard is available on our website under Sustainability and forms an integral part of our Expectations of Third Parties and should be read as part of this document.



Refuse to engage in bribery or corruption, even if it means losing business.

Trade Controls and Fair Competition

Conduct business consistent with fair and vigorous competition and in compliance with all applicable antitrust laws.

Engage only in fair business practices, including accurate and truthful advertising.

Comply with applicable trade regulations, including but not limited to licensing requirements, boycotts, embargoes, and other trade restrictions imposed by recognised authorities.

Engage in discussion with your competitors only when you have a legitimate business reason to do so, and only in a way that will not restrict competition (for example, limit discussion to public or non-proprietary information).

Do not abuse your market position (for example, dominance or monopoly) to exclude competitors or exploit customers.



Make sure your end-to-end supply chain is secure to prevent illegal trade of our products.



Compete fairly.

Product Security

Do not be involved in any activity that supports the illegal trade of medicines. *Illegal trade* includes counterfeit, illegally diverted, fraudulently traded, tampered with, and/or stolen.

Inform us as soon as possible if you have any suspicions of illegal trade or believe you have found an illegally traded medicine, and give us reasonable assistance in any related investigation.

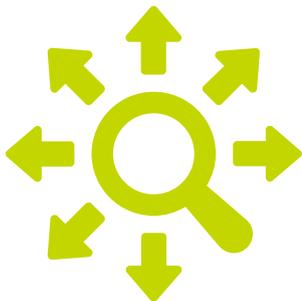
Provide a secure environment for all activities related to our medicines. Take steps to ensure the authenticity of products through the end-to-end supply chain, including maintaining procedures and records that ensure traceability of, for example, finished products, waste, and surplus, returned, and discarded products.

Animal Research & Welfare

Apply these principles to all animal studies and to the breeding and supplying of animals for use in such studies:

- Carefully consider the need for research involving animals. Only carry out animal studies after you have considered and applied the 3Rs: Replacement of animals; Reduction of the number needed; and Refinement of procedures to minimise distress. Treat animals humanely.
- When scientifically valid and acceptable to regulators, use alternatives to animals.
- Do not use wild-caught non-human primates or Great Ape species in your studies.

Our **Bioethics Policy** is available on our website under **Sustainability** and forms an integral part of our Expectations of Third Parties and should be read as part of this document.



Conduct high-quality, ethical science in all areas of research and development, and consistently apply the 3Rs.

Conflicts of Interest

Avoid and manage conflicts of interest, and notify all affected parties if an actual or potential conflict of interest arises.



Inform us in writing of any actual, apparent, or potential conflict of interest.

Patient Safety and Access to Information

Make sure you have sufficient management systems in place to minimise the risk of adversely impacting the rights of patients, subjects, and donors, including their rights to health and to directly access information.

Data Privacy

Comply with applicable privacy and data protection laws and respect and protect privacy of data subjects by collecting, using, retaining, sharing and/or disclosing personal data fairly, transparently and securely.

Respect data subject rights and inform AstraZeneca about queries and requests made by individuals or privacy regulators about AstraZeneca Personal Data.

Make sure you apply effective technological and physical security measures to all AstraZeneca Personal Data, securing it from any unauthorised use, damage, disclosure, diversion, or removal.

Never use and process AstraZeneca Personal Data for your own purposes without AstraZeneca's prior written approval.

Appoint a person in your company to be accountable for data privacy, and periodically train employees who will have access to AstraZeneca Personal Data to make sure they understand how to handle the data responsibly and in accordance with applicable privacy and data protection laws.

If you transfer personal data outside the jurisdiction it was collected in, ensure you are able to meet all legal and regulatory requirements for doing so, including the use of EU Standard Contractual Clauses and completing a Transfer Impact Assessment, and will provide evidence to AstraZeneca of this on request.

You are not subject to any laws or regulations that would require disclosure of any personal data you process on behalf of AstraZeneca to any public authorities.

You are not subject to any pending or threatened regulatory inquiries or investigations from data protection regulators.

Our Global Standard on Data Privacy is available on our website under Sustainability and forms an integral part of our Expectations of Third Parties and should be read as part of this document.



Protect AstraZeneca Personal Data and confidential information.

Ethical and Responsible Data and AI

At AstraZeneca, we expect human and machine to embody our company values. In view of this, we have put together a set of principles for Ethical Data & AI intended to provide ethical guidance on all aspects of Artificial Intelligence use. This will help ensure that AI solutions meet AstraZeneca's expectations. Our standards, which we expect third parties to meet, are set out in five principles stated in our Data and AI Ethics site available on our website under Sustainability.

We ensure there is end-to-end accountability for our and our partners' AI systems.

Cyber Security

Make sure you apply cyber security controls to protect information and systems. Utilise industry recognised frameworks to ensure controls adequately protect confidentiality, integrity, and availability of data and systems. You are expected to maintain and implement procedures to monitor and maintain the effectiveness of your cyber security programme and a description of the security management controls.

Examples of organisational policies and procedures you should maintain are: awareness and training, user and asset authentication, data protection and destruction, business continuity and response plans, continuous network and system monitoring, as well as incident management.

Confidentiality

Make sure any communication of confidential information is authorised, limited to individuals who need to know, and subject to a confidentiality agreement, or the confidentiality terms in your contract with us. Confidential information includes but is not limited to:

- Intellectual property and expertise that give AstraZeneca and our third party a competitive edge;
- Managerial information and statements of strategic intent; and
- Pricing or stock market sensitive data and statements.

Prohibit employees from insider trading, whether for their or another's profit.

Protect AstraZeneca's confidential company information even after your business relationship with us ends.

Product Communication

Communicating about our products includes any form of sharing information, material, or activity (whether promotional or non-promotional) designed to inform healthcare professionals and organisations, patients, investors, the media, and others about the characteristics and uses of our products.

Only communicate about AstraZeneca products (regardless of medium) when we specifically authorise you to do so.

- Promote our products in an ethical, fair, and balanced way.
- Use only materials and product information that are currently approved for use through AstraZeneca's review procedures.
- Do not communicate directly with patients or consumers unless authorised by AstraZeneca and allowed by local laws.
- Our Global Standard on Promoting Our Products is available on our website under Sustainability and forms an integral part of our Expectations of Third Parties and should be read as part of this document.

Anti-Tax Evasion

Do not commit tax evasion or do anything to facilitate it.

Maintain reasonable procedures designed to prevent employees, agents, or others who perform services for you, or on your behalf, from engaging in any conduct which might facilitate tax evasion.

Answer, in reasonable detail, any inquiry from us related to your procedures for preventing the facilitation of tax evasion.

Our Approach to Taxation is available on our website under Sustainability and forms an integral part of our Expectations of Third Parties and should be read as part of this document.

Do not commit tax evasion or do anything to enable it.



Make sure all materials in your supply chain are responsibly and ethically sourced and retain records to provide us with supporting evidence.

Sustainable Sourcing and Traceability

Source all materials responsibly and ethically.

Conduct due diligence through all levels of your supply chain on your sources of critical raw materials, in particular those identified in our Raw Materials Responsible Sourcing Framework to:

- Minimise environmental and social impacts.
- Ensure critical raw materials are sourced in accordance with the appropriate raw materials certification standards identified in our Raw Materials Responsible Sourcing Framework.
- Determine whether your supply chain for any products you manufacture or supply to us includes conflict minerals (including tantalum, tin, tungsten, and gold), and provide us with evidence on request that your supply chains do not contain such conflict minerals, to help us meet our obligations.
- Determine whether your supply chain for any products you manufacture or supply to us have the potential to contribute towards deforestation or forest degradation, and provide us with evidence on request that your supply chains do not result in such impacts, to help us meet our obligations.
- Ensure the sourcing of raw materials in your supply chain is compliant with the laws of the countries you and we operate in.

Our Raw Materials Responsible Sourcing Framework and our Conflict Minerals Statement are available on our website under Sustainability and form an integral part of our Expectations of Third Parties and should be read as part of this document.

Human Rights and Labour

We expect you to uphold internationally recognised human and employment rights of workers and treat them with dignity and respect.

Freely Chosen Employment, Anti-Slavery, and Anti-Trafficking

Never use, or condone the use of, forced, bonded, or indentured labour or involuntary prison labour.

Never engage in, support, or condone any form of slavery or human trafficking.

Use only voluntary workers, employing only those who freely choose to work with you and who are free to leave or end their employment at any time.

Place no unreasonable restrictions on a worker's freedom of movement, and do not use workers who have been required to pay for the job.

Promptly report to AstraZeneca all concerns and issues related to Modern Slavery and Human Trafficking identified in your business and supply chain.

A person is considered to be in slavery if he or she is:

- Forced to work, through mental or physical threat;
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- De-humanised and treated as a commodity or bought and sold as 'property'; and/or
- Physically constrained or restricted from free movement against their will or with the constringer's knowledge and intent to enslave or traffic.

Trafficking is the purposeful transportation of any person recruited, harboured, or brought into a situation of exploitation through violence, deception, or coercion and/or forced to work against their will.

Our Modern Slavery Statement is available on our website under Sustainability and forms an integral part of our Expectations of Third Parties and should be read as part of this document.

Child Labour and Young Workers

Never use child labour.

Use workers under the age of 18 only for work that is not harmful to them and does not interfere with their compulsory education.

Workers must be at least 15 (or 14 in certain developing countries, as described in ILO Convention No. 138). If local law sets a higher age for work, the higher age applies.



Never use child labour.

Inclusion and Diversity

Inclusion and diversity are fundamental to the success of our company, because innovation requires breakthrough ideas that only come from a diverse workforce and diverse partners empowered to challenge conventional thinking.

We want to work with third parties who share our values. Where information can be shared, we expect you to share your organisational diversity and inclusion goals with us and show us how you work inclusively to support diversity, both in your organisation and in your supply chain, so together we can maximise the power of diversity for innovation.

Supplier Inclusion and Diversity

We are committed to ensuring an inclusive and diverse supply chain through our Supplier Diversity Programme. We expect our suppliers to employ inclusive and transparent procurement practices and make best efforts to procure from small and diverse-owned businesses and social enterprises and ensure that such businesses are provided equal opportunity for inclusion.



**Power of diversity
for innovation.**

Non-Discrimination

Maintain a workplace culture of inclusion, diversity and equal opportunity that is free of any form of discrimination, and make sure you do not tolerate or condone discrimination based on legally defined protected characteristics.

Decisions about recruitment, reward, development, and promotion must be made solely on the basis of a person's ability, experience, behaviour, work performance, and/or demonstrated potential in relation to the job.

Fair Treatment

Make sure the workplace is safe and free of hostility. Demeaning behaviours like bullying and harassment, including sexual harassment have no place in the workplace.

Wages, Benefits, and Working Hours

Pay workers fair compensation based on applicable wage laws, complying with all aspects of such laws.

- Pay at least legal minimum wage, paying for relevant overtime hours and supplying mandated benefits.
- Make sure working hours comply with all applicable laws.
- Communicate with employees in a timely manner the basis of their compensation, as well as whether overtime is required and, if so, the wages to be paid for it.



Treat employees with dignity and respect and, at a minimum, in line with internationally recognised employment and human rights standards.

Freedom of Association

Work to resolve workplace and compensation issues through open communication and direct engagement with workers.

Respect the rights of workers, as defined in applicable laws, to associate freely, join or not join labour unions, seek representation, and join workers' councils.

Create and maintain a culture where workers are encouraged to communicate openly with management about working conditions, without threat of retaliation, intimidation, or harassment.

Our Human Rights Statement is available on our website under Sustainability and forms an integral part of our Expectations of Third Parties and should be read as part of this document.

Health and Safety

We have a company standard that commits to maintaining a safe work environment, healthy employees and protecting the planet. We expect you to have the same commitment.

Worker Protection

Protect people from unhealthy exposure to physical, psychological, chemical, or biological hazards, and have effective process safety controls to prevent and manage releases of chemicals.

Make information available about risks associated with safety, health, and the environment, including chemicals and pharmaceutical and other potentially hazardous material, and use the information to train and protect people and manage risks.

Comply with international and local regulations covering the manufacture, import, and transport of hazardous materials, including documentation, registration, and notification requirements.

Our Safety, Health and Environment (SHE) Standard is available on our website under Sustainability and forms an integral part of our Expectations of Third Parties and should be read as part of this document.



Protect the health and safety of your own employees and everyone in your value chain.

Process Safety

Make sure you have processes in place to identify the risks from chemical and biological processes and to effectively prevent or respond to catastrophic release of chemical or biological agents.

Emergency Preparedness and Response

Make sure you have identified and assessed emergency situations that could arise in the workplace and in any company-provided living quarters. Minimise the impact of such situations by putting emergency plans and response procedures in place.

Environment

We expect you to operate in an environmentally responsible and sustainable manner to minimise impacts on the environment.

Environmental Authorisations and Reporting

Comply with or exceed all applicable environmental regulations, including obtaining all required environmental permits, licenses, information registrations, and following operational and reporting requirements.

As healthcare providers, seek to understand the environmental impact of products and services, and provide data as requested to allow AstraZeneca to report on pharmaceutical product footprints.

Climate Action

Understand and work to minimise greenhouse gas emissions from your own operations and through your value chain by setting science based targets. Maximise the use of energy from renewable sources and consider making a commitment through RE100.

Understand the physical risks to your business from climate change and ensure risk mitigation plans are in place.

Waste and Emissions to Air, Land, and Water

Work in a way that, as far as practical, avoids the use of hazardous materials; minimises generation of waste through elimination, reuse, and/or recycling; and avoids emissions of greenhouse gases from refrigeration systems (for example, HFCs) and production processes (for example, solvents).

Control or treat any emissions to air, water, and land to minimise or eliminate the risk of adverse effects on people or the environment.

Make sure you have systems in place to ensure the safe handling, movement, storage, disposal, recycling, reuse, or management of waste, air emissions, and wastewater discharges.

Eliminate the use of non-critical single-use plastic in your operations. Avoid buying single-use plastic products such as straws, stirrers, cutlery, and plates,

and cups made of expanded polystyrene or oxo-degradable plastics for catering facilities.

Make sure you have systems in place to prevent and mitigate accidental spills and releases to the environment and any associated adverse impact on the local community.

Before releasing it into the environment, appropriately manage, control, and treat any waste, emissions, or wastewater with potential to adversely impact human or environmental health. This includes releases of active pharmaceuticals into the environment (PiE).

Our Pharmaceuticals in the Environment Statement is available on our website under Sustainability and forms an integral part of our Expectations of Third Parties and should be read as part of this document.



Operate responsibly to protect people and the planet.

Resource Use

Take steps to conserve water, energy, and other natural resources, continuously improving efficiency and reducing resource consumption.

Our Forestry Statement and our Water Stewardship Position Statement are available on our website under Sustainability and form an integral part of our Expectations of Third Parties and should be read as part of this document.

Management Systems and Reporting

We expect you to maintain business continuity and facilitate continuous improvement and compliance with these expectations.

Commitment and Accountability

Allocate appropriate resources and identify senior personnel accountable for meeting the expectations stated in this document.

Legal and Customer Requirements

Identify and comply with all applicable laws, regulations, codes, standards, and AstraZeneca requirements, both where you operate and where you will provide the service or product. Require the same of your own third parties.

Risk Identification and Management

Make sure you have mechanisms in place to assess, mitigate and manage risks in all areas addressed in these expectations.

Monitor your processes and activities to make sure they are operating appropriately and that risk control measures are effective.

Have periodic internal/external reviews to measure your risk controls and identify any actions needed to deliver continuous improvement.

Include in your review an assessment of the risks and controls related to work done on your behalf by your own third parties.

Inform AstraZeneca of any deviations from these Third Party Expectations related to your operations or supply chain.

Sustainability Commitment

We expect you to operate your business and work with AstraZeneca to build a sustainable future for all.

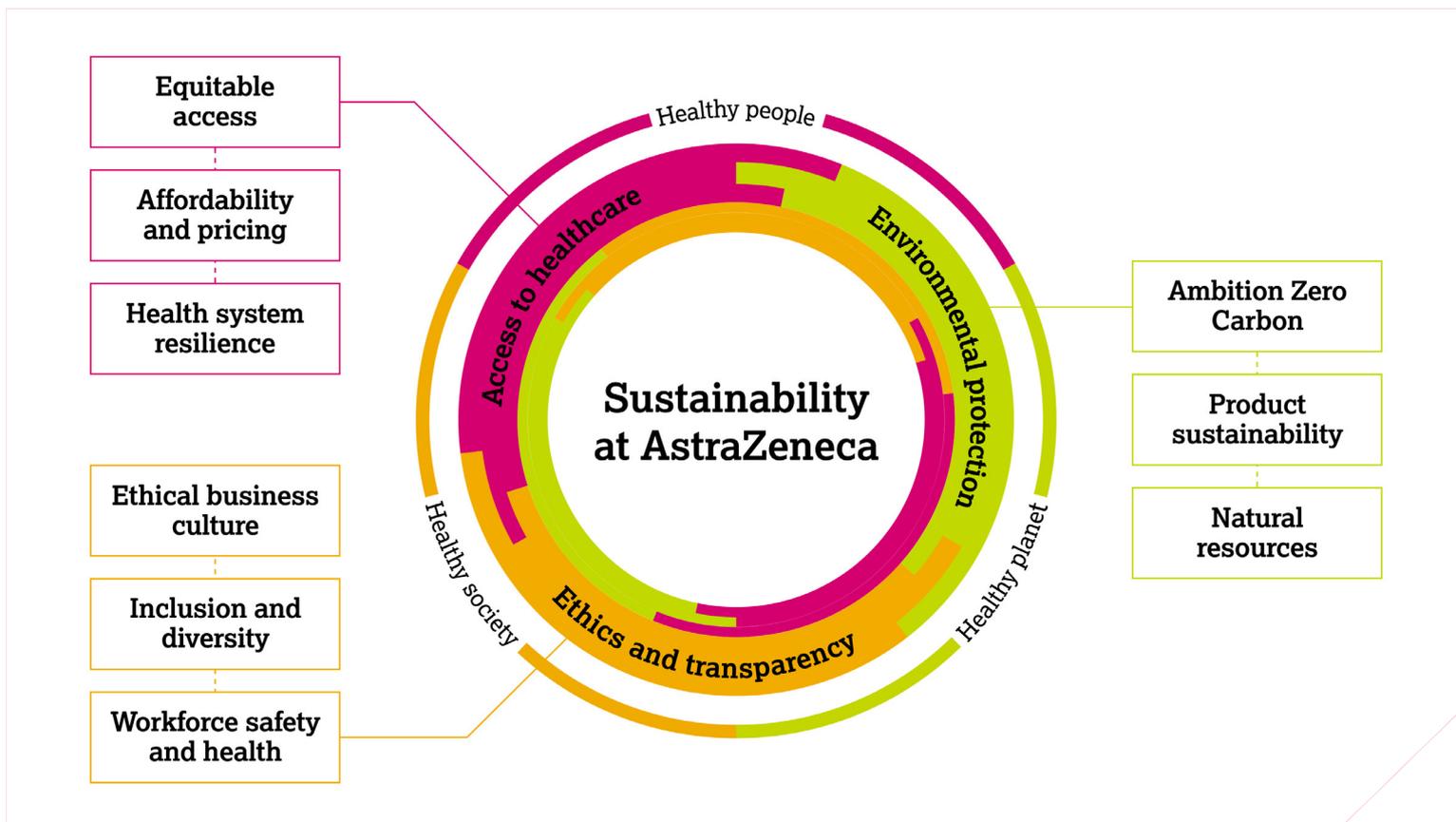
Our future depends on healthy people, a healthy society, and a healthy planet. We know that these elements are interconnected. Working in partnership with all our stakeholders, we must build a sustainable future, tackling the major issues of our time.

We are united by a desire to push the boundaries of science to deliver life-changing medicines and support sustainable healthcare in a way that is respectful of our planet. We are harnessing the power partnership to make a positive impact across our value chain.

Materiality assessment

Our materiality assessment guides our sustainability strategy by identifying the issues that matter most to AstraZeneca and our stakeholders, and shows where we can have the most positive impact.

Our expectation is that third parties will demonstrate a focus on sustainability issues which are aligned with our ambition. For AstraZeneca to continue to be a leader in sustainable development, we will look to work with third parties who will also support the achievement of our broader sustainability goals.



Standard Setting

Include in your governance structure policies and controls for managing business ethically.

Transparency in Reporting

Maintain documentation sufficient to demonstrate that you meet these expectations and comply with applicable regulations and reporting requirements to AstraZeneca.

To support improved transparency in our supply chains and decarbonisation of our business we expect third parties to commit to set Science Based Targets for the reduction of greenhouse gas emissions, annually report ESG information to EcoVadis and annually report climate data to CDP.

Communication, Training, and Competency

Make sure you have effective methods in place to communicate these expectations to relevant managers, employees, contractors, suppliers, and other third parties you employ. Provide training that gives them an appropriate level of knowledge, skills, and abilities to meet these expectations. Maintain records of training that can be shared with AstraZeneca.



**Communicate
Expectations of
Third Parties.**

Continuous Improvement

Set performance objectives that drive continuous improvement, and take actions needed to correct any identified deficiencies.

AstraZeneca has defined a Sustainability Framework, available on our website under Sustainability, which forms an integral part of our Expectations of Third Parties and should be read as part of this document. This supports continuous improvement in performance against our sustainability focus areas. Our expectation is that third parties will progressively develop sustainable business performance throughout our partnership.

We expect third parties to transparently and publicly report on Environmental, Social and Governance aspects of your business to support your progressive goals in sustainability. AstraZeneca reports to EcoVadis and to CDP. We expect our suppliers to match our expectations to support 100% ethical sourcing and action on environmental protection.

Our Sustainability Framework provides a development pathway for third parties who continue to work with AstraZeneca. We are committed to collaborating with third parties to improve sustainability from foundation level to sector leading and world class. This pathway considers a range of aspects of your enterprise, from people and governance to operational goals and external reporting and how you flow down your expectations to your supply chain.



Speak Up
YOUR VOICE MATTERS

Establish and maintain a culture in your organisation where only ethical and lawful behaviour is acceptable, and require the same of your own third parties.

Identification and Reporting of Concerns

Encourage everyone in the workplace (including your own third parties) to report any concerns, illegal activities, or lapses in meeting these expectations. Make sure your workplace culture encourages open communication without threat or fear of retaliation, intimidation, or harassment. Promptly escalate any issues or concerns to your business contact at AstraZeneca, or via one of the following channels:

Online

www.AZethics.com

Telephone

Find the telephone number(s) for your country at www.AZethics.com. Tell the call centre the language you prefer.

AZethics is managed by an independent third party on AstraZeneca's behalf and is available 24 hours a day, 7 days a week. Any concerns raised will be fully investigated and appropriate action taken if substantiated.

E-mail

GlobalCompliance@astrazeneca.com

Post

Global Compliance
AstraZeneca PLC
1 Francis Crick Avenue
Cambridge Biomedical Campus
Cambridge CB2 0AA
United Kingdom

You can also use these channels to ask a question about AstraZeneca's Code of Ethics or any ethics or compliance issue.