Expectations of Third Parties

A Handbook for Third Parties Working with AstraZeneca
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

Thank you for your interest in AstraZeneca. 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 handbook 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 handbook 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 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 handbook.
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 handbook, 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 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.
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 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.

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.

For more information, see our Bioethics Global Standard, available on our website under Sustainability.

Conflicts of Interest

Take reasonable care to 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.

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

Comply with applicable privacy and data protection laws and ensure the protection, security, and lawful and ethical use of personal data.

Protect confidential information to protect the rights of the company, workers, patients, subjects, and donors. Subject means anyone who participates as a subject in scientific and medical or product testing. Donor means anyone who donates tissues, cells, organs, or any other body parts for research.

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 train employees who will have access to AstraZeneca Personal Data to make sure they understand how to handle the data responsibly.

For more information (including the definition of AstraZeneca Personal Data), see our Data Privacy Global Standard available on our website under Sustainability.

Confidentiality

Make sure any communication of confidential information is authorised, limited to individuals who need to know, and subject to a confidentiality agreement. 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.

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.

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

Sustainable Sourcing and Traceability

Source all materials responsibly and ethically, conducting due diligence on the sources of critical raw materials to promote legal and sustainable sourcing.

Determine whether your supply chain for any products we manufacture or contract to manufacture includes conflict minerals (including tantalum, tin, tungsten, and gold), and provide us with evidence of compliance on request to help us meet our obligations.

Make sure all materials in your supply chain are ethically sourced.
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 constrainer’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.

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.

Supplier Inclusion & Diversity

Maximise opportunities for small and diverse-owned businesses, including, for example, those owned by minorities or any others who are socially disadvantaged. A socially disadvantaged person is anyone likely to be subjected to gender, racial, or ethnic prejudice or cultural bias in society because of the individual’s identity as a member of a certain group stemming from circumstances beyond the individual’s control.
Non-Discrimination

Keep the workplace free of any form of discrimination, and make sure you do not condone discrimination for reasons such as race, colour, age, gender, gender identity or expression, pregnancy, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status.

Make decisions about recruitment, development, and promotion based purely on merit, performance, and ability.

Fair Treatment

Make sure the workplace is free of harassment, harsh and inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse. Do not allow anyone even to threaten such treatment.

Wages, Benefits, and Working Hours

Pay workers according to 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.
- Pay the national “living wage” where we have notified you that we recognise and wish to implement it.
- 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.

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.

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

For more information about our commitment to people around the world, see our Human Rights Statement, available on our website under Sustainability.
Health and Safety

We expect you to make sure the conditions for workers are safe and healthy.
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.

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 efficient manner to minimise adverse impacts on the environment.
Environmental Authorisations and Reporting

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

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 avoidance, 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 the extent necessary 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.

Minimise use of single-use plastic in your operations. Avoid buying single-use plastic products (for example, straws, stirrers, cutlery, and plates, and cups made of expanded polystyrene or oxo-degradable plastics) for our catering facilities.

Spills and Releases

Make sure you have systems in place to prevent and mitigate accidental spills and releases to the environment and any 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).

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, and using energy from renewable sources when it is available.
Management Systems

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 responsible for meeting the expectations described in this handbook.

Legal and Customer Requirements

Identify and comply with all applicable laws, regulations, codes, standards, and customer 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 determine 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.

Sustainability Commitment

Set sustainability goals and targets linked to issues that are material to your industry and items aligned with your business goals.

Standard Setting

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

Documentation

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

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. Provide training that gives them an appropriate level of knowledge, skills, and abilities to meet these expectations.

Communicate expectations of Third Parties.

Continuous Improvement

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