

Zealand Pharma Supplier Code of Conduct

Zealand Pharma is committed to delivering innovative medical solutions while maintaining high standards of economic, environmental, and social responsibility. This Supplier Code of Conduct outlines our standards expected from our suppliers and their suppliers. Zealand Pharma commits to regularly reviewing and updating this Supplier Code of Conduct to ensure continued alignment with evolving international standards, best practices in sustainability, and ethical business conduct. This commitment extends to ensuring that both our suppliers and their suppliers adhere to these evolving standards. The Supplier Code of Conduct incorporates the five key principles outlined by the Pharmaceutical Supply Chain Initiative (PSCI).

Zealand Pharma is committed to upholding sustainability, human rights, and responsible business conduct throughout our value chain. Zealand Pharma adheres to all applicable sustainability-related laws and regulations and expects our suppliers to do the same. Our commitment and expectations towards our business partners and suppliers are grounded in internationally recognized standards, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), OECD Guidelines for Multinational Enterprises, and the International Labour Organization's (ILO) fundamental conventions.

Zealand Pharma commits itself to uphold the principles outlined in this Supplier Code of Conduct, and expects all business partners and suppliers to acknowledge, and uphold these principles as well. Any deviations from this Supplier Code of Conduct must be mutually agreed between the supplier and Zealand Pharma, under the condition that it adheres to the same high standards.

Suppliers are at all times required to comply with local and national laws and regulations, including those that are more stringent than the principles in this document.

Zealand Pharma reserves the right to assess suppliers' compliance with this Supplier Code of Conduct through audits, surveys, or other means. Where violations are identified, suppliers must engage in timely and documented corrective actions. In cases of serious or repeated non-compliance, Zealand Pharma may suspend or terminate the business relationship and exclude the supplier from future opportunities.

Zealand Pharma's Broader Commitment

Zealand Pharma views its suppliers as vital partners in our mission to improve patient lives. We are committed to building supply chains that are not only efficient and compliant but also inclusive, resilient, and sustainable over the long term. We encourage suppliers to contribute positively to the economic, environmental, and social development of the regions in which they operate by creating fair employment opportunities, engaging with local communities, and supporting inclusive business practices to create shared value.

Zealand Pharma believes open communication and collaboration with our business partners, is key to achieving these goals. We invite our business partners to engage in dialogue to collaboratively develop solutions that uphold our shared commitment to sustainability, human rights, and ethical business practices. Suppliers are encouraged to proactively reach out with questions, concerns, or suggestions anytime. Through ongoing communication, we aim to strengthen our partnerships, driving continuous improvement across all operations and ensuring alignment with our long term sustainability objectives.



Ethics

Anti-bribery and Corruption

Any form of corruption, including bribery, fraud, theft, extortion, embezzlement, other illegal inducements, or improper advantages are nonacceptable. Improper advantages refer to any practices that circumvent ethical business standards, including illegal rebates, bribes, kickbacks, undisclosed payments, or gifts. Suppliers must act with integrity and in full compliance with all applicable anti-corruption laws, including the OECD Anti-Bribery Convention and the OECD Guidelines for Multinational Enterprises.

Fair Competition and Antitrust

Suppliers must uphold fair competition and comply with all applicable antitrust and competition laws. Suppliers shall employ honest business practices and avoid misleading or deceptive conduct.

Conflict of Interest

Suppliers must identify, avoid, and manage situations that may create actual or perceived conflicts of interest. Any such conflicts involving their relationship with Zealand Pharma must be disclosed without delay. This includes personal, financial, or other interests that could improperly influence decision-making or business conduct.

Animal welfare

Suppliers shall, where relevant, comply with all applicable animal welfare laws and recognized industry standards. The use of animals must be scientifically justified, with documented consideration of valid alternatives, and conducted in line with the 3Rs (Replace, Reduce, Refine).

Privacy and Data Protection

Suppliers must comply with applicable data protection laws, including the EU General Data Protection Regulation (GDPR). All personal data must be processed lawfully, securely, and only for legitimate purposes.

Technology and Cybersecurity

Suppliers must maintain cybersecurity measures appropriate to the nature and scale of their services, including:

- Compliance with applicable cybersecurity regulations in their jurisdiction, including but not limited to the Danish NIS2 Act, where applicable
- Implementation of industry-standard cybersecurity frameworks (e.g., ISO 27001, NIST Framework, etc.)
- Prompt notification of any security incidents that may affect Zealand Pharma or its data
- Any additional cybersecurity requirements as specified in the agreement(s) with Zealand Pharma

Intellectual property

Zealand Pharma values the protection of intellectual property (IP) rights and expects suppliers to do the same. Suppliers must respect all forms of IP, including patents, trademarks, copyrights, and trade secrets related to the products and proprietary information of Zealand Pharma. Suppliers are required to implement measures to prevent unauthorized use, disclosure, or infringement, ensuring confidentiality and restricted access to such information. Any suspected breaches must be promptly reported to Zealand Pharma to facilitate corrective actions. Protecting IP is vital for innovation and competitive advantage, and suppliers play a key role in these efforts



Product Governance, Integrity and Security

Suppliers are responsible for ensuring the protection of the integrity of their products and components. This involves implementing security measures to prevent tampering, theft, falsification, or unauthorized resale, with protocols covering every stage from transportation to storage, and labeling, particularly for high-value or sensitive goods.

To uphold these standards, suppliers should, where relevant, establish a comprehensive Quality Management System aligned with recognized industry benchmarks, such as ISO 9001 and mandatory GMP/GCP/GDP certifications. It's important to set clear policies concerning product safety and responsible marketing practices, anchored by senior-level oversight and collaborative safety committees. Continuous monitoring through quality indicators, along with procedures for handling product recalls and safety incidents, is essential. Suppliers should maintain transparency through detailed incident reporting and corrective-action plans, supported by regular evaluations by independent third parties.

Human Rights & Labor

Zealand Pharma is committed to upholding internationally recognized human rights and labor standards, including the International Bill of Human Rights, the ILO Core Conventions, and the UN Guiding Principles on Business and Human Rights (UNGPs). Suppliers must demonstrate respect for these rights and ensure they are upheld throughout their own operations and supply chains.

Freely Chosen Employment

Suppliers shall not use forced, bonded, indentured, or prison labor, nor tolerate modern slavery or human trafficking. Workers must be employed voluntarily and be free to terminate their employment with reasonable notice. Suppliers must not retain workers' identification documents or charge recruitment fees, directly or indirectly. Suppliers must align with ILO Conventions 29 and 105 and must assess and mitigate the risk of forced labor and modern slavery not only in their own operations but also within their extended supply chains, especially where sourced from high-risk countries or sectors.

Child Labor and Young Workers

Child labor is strictly forbidden both in the suppliers' own operation and in their extended supply chain. Workers under 18 must not perform hazardous work, night shifts, or any activity that may compromise their health, safety, or education. Age verification and employment records must be maintained. Suppliers are expected to assess child labor risks in their sourcing geographies and industries, and to take proactive steps to prevent exposure. This includes conducting due diligence and engaging with upstream suppliers where necessary, in accordance with ILO Conventions 138 and 182.

Non-Discrimination and Fair Treatment

Suppliers must provide a workplace free from discrimination, harassment, and abuse. All employment decisions including hiring, promotion, compensation, and termination must be based on merit and not on race, gender, age, disability, religion, sexual orientation, gender identity, national origin, political opinion, union affiliation, or any other protected status. Retaliation against individuals who raise concerns or assert rights is strictly prohibited. This reflects the specifications of ILO Conventions 100 and 111.

Local- and indigenous communities

Suppliers must uphold the rights of local communities surrounding their sites, ensuring they maintain a clean and healthy environment. Furthermore, suppliers are tasked with respecting, promoting, and safeguarding the rights of indigenous communities and people.



Wages, Benefits, and Working Hours

Suppliers must ensure that workers are compensated in accordance with applicable wage laws and agreed employment contracts. This includes adhering to minimum wage requirements, providing overtime pay, and offering mandated benefits. Compensation should reflect the workers' skills, performance, and experience, and align with local competitive conditions and market practices.

It is essential that suppliers clearly communicate to workers the terms of their compensation in a timely manner. Overtime work must be voluntary and in compliance with relevant national and international standards.

Freedom of Association and Collective Bargaining

Suppliers shall respect workers' rights to form or join trade unions, engage in collective bargaining, and participate in worker organizations of their own choosing without interference or retaliation. Where freedom of association is legally restricted, suppliers must allow alternative forms of worker representation. Worker representatives must be given access to necessary facilities to carry out their functions. Zealand Pharma expects suppliers to actively enable worker voice in all contexts, in accordance with ILO Conventions 87 and 98, and where union representation is legally restricted, to implement parallel and effective forms of independent worker representation.

Health & Safety

Safety of the Work Environment

Suppliers should conduct adequate risk assessments, and establish a safety culture to ensure safety in the work environment. Safety information concerning hazardous materials, including pharmaceutical compounds and intermediates, should be accessible to educate, train, and protect workers.

Worker Protection

Suppliers are responsible for shielding workers from excessive exposure to chemical, biological, physical, and ergonomic hazards. They must provide suitable equipment, facilities, and services to uphold workers' safety, health, and overall well-being.

Process Safety

Suppliers should implement management processes to identify, evaluate, and mitigate risks, particularly those associated with chemical and biological procedures.

Emergency Preparedness and Response

Suppliers must identify potential emergency situations, minimize impact, equip for an emergency response, establish and execute response procedures.

Safety information relating to hazardous materials, including pharmaceutical compounds, and intermediate pharmaceutical materials, should be available to protect workers from potential hazards. Such safety information shall be available in written documents, in languages commonly used by the Supplier's workforce.

Environment

Environmental Compliance

Suppliers must comply with all applicable local, national, and international environmental laws, and regulations. This includes but is not limited to requirements for valid environmental permits, emissions



thresholds, chemical storage and handling, and waste disposal. Suppliers must maintain up-to-date documentation and report as required by relevant authorities.

Resource Efficiency and Climate Protection

Suppliers shall operate in an environmentally responsible and resource-efficient manner. Suppliers are expected to conserve natural resources by sourcing material sustainably. Zealand Pharma expects suppliers to demonstrate ongoing efforts to improve energy efficiency and use resources responsibly. Suppliers are encouraged to take proactive measures to protect the climate by reducing their greenhouse gas emissions across Scope 1, 2, and, where relevant, Scope 3. Climate strategies should be aligned with the 1.5°C goal of the Paris Agreement. Suppliers are highly encouraged to set science-based targets, transition to renewable energy, publicly disclose their environmental impact, and report their performance of improvement measures.

Water Stewardship

Suppliers should manage water responsibly and safeguard water quality across their operations. Where activities take place in water-stressed regions, suppliers should assess local risks and implement context-specific water efficiency, reuse, and treatment practices. Suppliers are encouraged to engage in collective efforts to preserve shared water resources, and to align their practices with recognized water stewardship frameworks such as those developed by the Alliance for Water Stewardship (AWS).

Waste, Spills and Pollution Prevention

Suppliers shall ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any waste, wastewater, or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment. Systems shall be in place to prevent and mitigate accidental spills and releases to the environment.

Hazardous Substances and Phase-Out

Suppliers must avoid the use of banned or restricted substances and commit to phasing out Substances of Very High Concern (SVHC) and per- and polyfluoroalkyl substances (PFAS), in line with EU and international regulations. Full material disclosures and Safety Data Sheets (SDS) must be provided upon request to enable compliance, circularity, and informed risk management. Suppliers are required to furnish accurate and compliant material declarations.

Governance and management systems

Zealand Pharma expects its suppliers to operate responsibly, maintain effective management systems, and continuously improve in line with the principles set out in this Code. These systems should be appropriate to the size, risk profile, and nature of the supplier's activities.

Commitment and accountability

Zealand Pharma will on an ongoing basis assess suppliers' compliance with this Supplier Code of Conduct. Suppliers may be asked to provide information and documentation to demonstrate compliance with this Supplier Code of Conduct. Any observations and discrepancies will be discussed with the Supplier to ensure compliance with this document, and the overall Supplier performance on these dimensions considered when selecting and awarding new or continuing engagements.

Legal and Contractual Compliance



Suppliers must comply with all applicable laws, industry standards, and contractual obligations related to ethics, labor, health and safety, environmental protection, and sustainability.

Continuous Improvement

Suppliers are expected to continuously improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.

Grievance and Whistleblowing Mechanisms

Suppliers are expected to implement grievance and whistleblowing mechanisms that allow employees, contractors, and external stakeholders to raise concerns related to this Supplier Code of Conduct including issues involving human rights, labor practices, environmental risks, corruption, or other forms of non-compliance. These mechanisms must be accessible, clearly communicated, and protect the confidentiality and safety of individuals raising concerns.

Reports must be handled promptly, fairly, and without fear of retaliation. Concerns should be logged, investigated, and resolved through corrective and, where appropriate, remedial actions. Zealand Pharma encourages proactive communication and timely notification about any serious issues or breaches that could impact the business relationship.

Reporting Breaches to this Supplier Code of Conduct

Zealand Pharma is committed to maintaining the highest standards of transparency and integrity throughout its supply chain. We encourage all suppliers, employees, contractors, and other stakeholders to report any suspected or actual material breaches of this Supplier Code of Conduct. This includes, but is not limited to, violations concerning human rights, environmental practices, or ethical conduct. Reports may be submitted confidentially via Zealand Pharma's designated Compliance Hotline, accessible through our webpage: <https://www.zealandpharma.com/contact/compliance-hotline/> subject to Zealand Pharma's Compliance Hotline Policy in effect at any given time. <https://www.zealandpharma.com/https://whistleblower.plesner.com/client/Zealand>

The Compliance Hotline is available for use by both Zealand Pharma employees and external stakeholders, including suppliers, suppliers' subcontractors, or anyone covered by the Compliance Hotline Policy. Using the Compliance Hotline is not mandatory for communication if anonymity is not preferred and as such, concerns can also be addressed directly to the relevant contact at Zealand Pharma.

Confidentiality and Protection

The Compliance Hotline allows for reports to be filed swiftly, anonymously if preferred, and ensures thorough investigation of all reported matters, maintaining confidentiality and protection for the reporting individuals.

Zealand Pharma treats all submissions with the utmost confidentiality and safeguards the anonymity of reporting individuals, consistent with the principles outlined in our Compliance Hotline Policy, accessible through the following link: [Compliance Hotline Policy](#). Those reporting are protected from retaliation as long as the reporting is not made in bad faith. Reports are handled promptly, fairly, and thoroughly to ensure appropriate remediation of any identified issues.

Data Security Breaches



Suppliers must notify Zealand Pharma by email at breachnotification@zealandpharma.com of any suspected or confirmed security breach that may impact Zealand Pharma's data or operations without undue delay, and in any case, no later than 24 hours after becoming aware of it.

Conclusion

By adhering to this Supplier Code of Conduct, Zealand Pharma is dedicated to building a sustainable and responsible supply chain. This collaboration with our suppliers is vital to maintaining the highest ethical standards and is central to our shared mission to improve patient lives. Commitment to these principles drives us towards a future that is more equitable, environmentally conscious, and socially responsible. Together, we strive to foster a business environment that embodies these enduring values, reflecting our collective pursuit of a better society.

Glossary of Abbreviations for Zealand Pharma Supplier Code of Conduct

- **GDPR:** General Data Protection Regulation
- **GMP:** Good Manufacturing Practice
- **GDP:** Good Distribution Practice
- **ILO:** International Labour Organization
- **IP:** Intellectual Property
- **PSCI:** Pharmaceutical Supply Chain Initiative
- **NIS2:** Network and Information Systems Directive 2
- **SVHC:** Substances of Very High Concern
- **PFAS:** Per- and Polyfluoroalkyl Substances
- **OECD:** Organisation for Economic Co-operation and Development
- **UNGP:** United Nations Guiding Principles on Business and Human Rights