



# Norgine Business Code

---

January 2022





**Peter Stein**

Norgine is inspired by patients, and our mission is to provide access to transformative medicines which may otherwise never reach the people who need them. We have been transforming patient lives for over 100 years and we are proud to be able to help a growing number of patients worldwide every year. The Norgine Business Code establishes the framework for achieving our vision of providing innovative healthcare solutions that transform lives.

High standards of ethical conduct and trust are key components of this framework and are integral to all our relationships, starting with the patients themselves and extending to all our partners with whom we engage.

The Norgine Business Code and related policies require the active commitment of all Norgine employees as well as those acting on our behalf or doing business with Norgine. We are all responsible for understanding and adhering to the Norgine Business Code and upholding Norgine's values. It is the **One Norgine** approach and, quite simply, *it is the right thing to do.*

Not every situation is addressed in the Norgine Business Code. If you are uncertain or need guidance, it is important to **Speak Up** and raise your questions, concerns, or suggestions through any of the mechanisms available. Your engagement is critical to our continuing success.

## DOING THE RIGHT THING

Our values are at the centre of what we do and who we are.

- We work together as One Norgine, sharing in a common set of values
- We are trustworthy and act with integrity in all our dealings across Norgine and external stakeholders
- We have respect for one another and look after the safety of our colleagues and stakeholders
- Our business meets the highest standards of compliance, thanks to our commitment to operational excellence
- In summary, **we do the right thing**

## ONE NORGINE

**As One Norgine we work together as a unified team to make a real difference to people's lives.**

We adopt an entrepreneurial mindset, remaining results driven and committed to cultivating successful partnerships.

We set high standards for ourselves and our partners, taking ownership and delivering on our promises, and working with passion and positivity.

We create an environment in which we are open to new ideas and it is safe to speak up.

## SAFE TO SPEAK UP

**We want to hear from you and you have a responsibility to Speak Up.**

If you have questions or concerns about what is the right thing to do, always speak up. If you are unsure, consider the following:

- Could it cause harm to our patients, colleagues or partners?
- Could it adversely impact Norgine's reputation?
- Does this comply with applicable laws, regulations and / or codes of practice?
- Is there a relevant Norgine SOP or policy that addresses the issue?
- Is it consistent with the Norgine Business Code and its core values?

If in doubt, do not wait. Contact your Line Manager or HR representative for advice. In addition, any suspected or actual financial fraud or wrongdoing must be immediately reported to your Finance representative.

### REPORTING METHODS

☎ **+44 (0)1895 810038**      ✉ **nbc@norgine.com**

✉ **CHRO, Norgine B.V., Antonio Vivaldistraat 150,  
1083 HP Amsterdam, The Netherlands**

Those who speak up will be protected to the fullest extent, preserving anonymity if requested. Any retaliation will be subject to disciplinary action, up to and including dismissal.

# COMPLIANCE, ETHICS AND OPERATIONAL EXCELLENCE

**Compliance and Ethics are fundamental to our operations and relationships.**

## BRIBERY & CORRUPTION

Norgine maintains a **zero-tolerance** policy with respect to bribery and corruption. Our employees and our business partners must comply with all applicable laws in the territories in which we and they operate.

## ACCURATE REPORTING & RECORD KEEPING

To ensure transparency for all of our stakeholders and to accurately monitor our performance we are committed to accurate record keeping, and comply with all relevant laws and regulations governing record keeping, accounting and reporting.

## RESEARCH, DEVELOPMENT, MANUFACTURING AND COMPLIANCE WITH GxPs

The development, manufacturing, and delivery of products to patients is at the core of our business. Products are subject to rigorous scientific research and review; inspections and commercial analysis and our quality systems ensure compliance with relevant laws and regulations that govern our activities. We fully cooperate with governmental agencies in response to all compliance questions or requests.

Communication of the knowledge we have gained through our research is key and shared with our employees, partners and with the medical, scientific, and patient communities.

## PRODUCT QUALITY, SAFETY & EXCELLENCE

Product quality, safety and excellence run through all our operations from the development, manufacture, and delivery of products to patients. Through ensuring the safe use of our products, we deliver high quality services to all our stakeholders, continuously monitoring and advising regulators and patients of any changes to product safety.

## PRODUCT SUPPLY & PROMOTION

Patient benefit and safety are of paramount importance. We are committed to the ethical supply and promotion of our products in compliance with applicable legislation and codes of practice.



# INTEGRITY

Our integrity underpins what we do.

## PROTECTING OUR ASSETS

We are all responsible and trusted to act in Norgine's best interests, ensuring the proper use and protection of Norgine's physical assets (e.g. computers, phones, car fleet, etc.) and intangible assets, such as its confidential information and trade secrets and those of its partners.

## CONFIDENTIAL INFORMATION / DATA PRIVACY

Norgine is committed to safeguarding all data and ensuring compliance with applicable laws and regulations governing our operations. We process data in a lawful and ethical manner and ensure that all confidential information is kept securely, including that of third parties. Employees may not communicate non-public information about Norgine, its business partners or potential business partners without appropriate authority.

Norgine respects the privacy of our employees and third parties with whom Norgine has relationships (e.g. physicians and other healthcare professionals, patients and patient organisations, and representatives of the scientific community) and will exercise all appropriate care to ensure that sensitive, personally identifiable information is not publicly disclosed and is protected and only used and retained in accordance with applicable laws and regulations.

## LEGAL AUTHORITY

Only authorised employees are able to act on behalf of Norgine companies and sign legal agreements, in line with the Board Directorship and Signatory Delegation Policy.

## CONFLICTS OF INTEREST

Norgine employees act on behalf of the company in a professional manner. Employees must avoid conflicts of interest and disclose any actual or perceived conflicts between their personal interests and those of Norgine.



*Because patients inspire us*

# RESPECT AND FAIRNESS

We create an inclusive environment that provides opportunities for our people to thrive.

## EQUAL OPPORTUNITY

Norgine is an equal opportunity employer and will not tolerate discrimination or harassment based upon sex, marital status, sexual orientation, gender reassignment, age, race, religion, ethnic origin, disability, pregnancy and maternity or any other category. The continued success of Norgine depends upon developing and promoting the talents of Norgine employees and rewarding all individuals fairly.

## HUMAN RIGHTS / MODERN SLAVERY

Our responsibility to respect human rights extends throughout our operations, from laboratory to patient.

We take a **zero-tolerance approach** to any form of modern slavery or human trafficking in our supply chains and in any other part of our business.

## SAFETY, HEALTH & WELLBEING

We actively promote and invest in the Safety, Health and Wellbeing of our employees, providing a safe and healthy environment in which to work and programs and information designed to promote the wellbeing of Norgine employees.

## ENVIRONMENT

We continuously seek to minimise the environmental impact of our activities, including the use of hazardous substances and encourage waste recycling and re-use.

## ANTI-TRUST & FAIR COMPETITION

We support free, robust, and open competition, promoting and encouraging fair competition. All Norgine companies abide by the antitrust and competition laws of the countries in which they operate.



## WORKING WITH PARTNERS

We cultivate mutually beneficial long-term partnerships built on trust and shared commitment.

### BUSINESS PARTNERS & SUPPLIERS

Norgine engages with partners and suppliers who embrace high ethical standards and deliver quality services in accordance with all contractual obligations. All potential business partners and suppliers go through a qualification process to ensure they meet Norgine's values and expectations.

### INSIDER TRADING

Norgine employees are prohibited, both directly and indirectly, from making investment decisions based on inside information relating to any of our stakeholders, including partners. Insider information must remain confidential and utilised only for authorised purposes.

### PATIENT CARERS, PATIENT ORGANISATIONS, PAYERS, HEALTHCARE PROFESSIONALS, HEALTHCARE ORGANISATIONS AND CHARITIES

"Because Patients Inspire Us", Norgine's relationships and interactions with individuals and organisations are driven by patient needs. All engagements are conducted with transparency, integrity and in compliance with applicable laws, regulations, and local codes of practice.



By living these values we will continue to drive success together



*Because patients inspire us*