



# IPSEN BUSINESS PARTNER **CODE OF CONDUCT**

# COMMITMENT & PURPOSE

Ipsen is dedicated to improving patients' lives and firmly committed to an ethical culture and **Generation Ipsen**. Generation Ipsen is a transformative sustainability strategy that signals Ipsen's commitment to shaping a better, healthier world, anchored by four pillars—Environment, Patients, People, and Governance—integrating purposeful actions that are both tangible and visible. Generation Ipsen fosters a culture of integrity, transparency, and responsibility that permeates every facet of the organization, emphasizing individual roles in shaping positive change.

The 10 principles of the [United Nations Global Compact](#), to which Ipsen is [signatory](#), are integrated in our own Code of Conduct. Ipsen is a member of the International Federation of Pharmaceutical Manufacturers and Associations (IFPMA) and of the European Federation of Pharmaceutical Industries and Associations (EFPIA), to contribute to reduce inequalities in health, accelerate patients' access to innovative medicines and improve patient safety.

This Business Partner Code of Conduct articulates Ipsen's commitment to responsible business and sets forth the principles and expectations for Ipsen Business Partners. Business Partners are entities and individuals that provide goods and services to Ipsen, or act on behalf of Ipsen, such as and not limited to suppliers, including sub-contractors, consultants, distributors and agents.



# PRINCIPLES & EXPECTATIONS

Ipsen recognizes that its Business Partners play an important role in Ipsen's success and commitments. We seek relationships with Business Partners who operate in accordance with the following principles:

- » Committed to ethics and business integrity.
- » Embrace sustainability and operate in an environmentally responsible manner.
- » Respect human rights and labour, health and safety of the employees.
- » Foster a culture of diversity, equity & inclusion.
- » Ensure transparency about impact on the environment and society.
- » Integrate quality assurance into the business processes.
- » Implement management systems and information security that safeguard personal information.

Business Partners are expected to:

- » Uphold to the standards in this Code of Conduct.
- » Uphold similar requirements in their supply base and business relationships.
- » Comply with all applicable laws and regulations.
- » Monitor and promote compliance with this Code of Conduct.
- » Support Ipsen in: Risk assessments & qualifications (where applicable), Generation Ipsen & Sustainable Procurement ambitions, Compliance to Corporate Sustainability Reporting Directive (CSRD).

## USE OF THE CODE

Business Partners shall communicate and implement the expectations in this Code of Conduct, or similar, to their employees and business partners. We encourage a constructive engagement with our Business Partners and aim to support in building capabilities with these standards. We may also engage with Business Partners to confirm compliance with these standards, including use of due diligence and risk assessment questionnaires, on-site assessments, or other necessary activities.

Ipsen reserves the right to not enter or to discontinue a relationship with a Business Partner whose practices fail to conform to these standards.

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# HUMAN RIGHTS & LABOUR

**Business Partners shall uphold the human rights of workers and treat workers with dignity and respect. They are expected to comply with international human rights treaties (with the International Labour Organization), without prejudice to more favourable national laws.**

## **CHILD LABOUR AND YOUNG WORKERS**

Business Partners shall not engage or support any forms of child labour, not employ a person under the age of 15 (or under the legal age for finishing compulsory schooling) or person under the age of 18 for hazardous and night work.

## **FREE CHOSEN EMPLOYMENT**

Business Partners shall not use forced, bonded, or indentured labour, involuntary prison labour or human trafficking. Employees have the right to enter employment voluntarily and freely. Employees have the right to freely terminate employment at any time without the threat of penalty, by means of reasonable notice.

## **NO VIOLENCE, NO DISCRIMINATION AND FAIR TREATMENT**

Business Partners shall provide a workplace free from discrimination and harassment. They shall not subject workers to inhumane treatment such as sexual harassment or corporal punishment. They shall ensure equal opportunity and treatment of all employees in recruitment, employment, development, and career advancement, providing equal opportunities based on fair, transparent and objective criteria.

## **WAGES, BENEFITS AND WORK HOURS**

Business Partners shall pay workers according to applicable wage laws, including minimum wage, overtime hours and mandated benefits. Business Partners shall clearly and promptly communicate on the basis on which workers are paid. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned.

## **FREEDOM OF EXPRESSION AND ASSOCIATION**

Business Partners shall respect the right for employees to communicate, raise concerns about working conditions, and to establish and join trade union of their own choice, in compliance with applicable laws and regulations freely and voluntarily.

# HEALTH & SAFETY

**Business Partners shall provide a safe and healthy working environment for their employees and the public. They shall adopt a continuous improvement approach to health & safety, and comply with applicable workplace safety laws, regulations, policies, and Environment, Health and Safety (EHS) standards.**

## **WORKERS HEALTH AND SAFETY**

Business Partners shall protect workers from over exposure to chemicals, biological and physical hazards, and physically demanding tasks in the workplace and in any company-provided living quarters. Business Partners shall have programs in place to prevent or mitigate catastrophic incidents associated with operations and processes. Programs shall be commensurate with the facility risks. Business Partners shall ensure access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

## **HAZARD INFORMATION AND TRAINING**

Business Partners shall make available safety information relating to hazardous materials in the workplace, including pharmaceutical compounds and pharmaceutical intermediate materials, to educate, train and protect workers and others from hazards.

## **EMERGENCY AND PREPAREDNESS**

Business Partners shall identify and assess emergency situations in the workplace and any company-provided living quarters and minimize their impact through prevention and by implementing emergency plans and response procedures.

# ENVIRONMENT

**Business Partners shall operate in an environmentally responsible and efficient manner into all aspects of their business. They shall have appropriate management systems in place to effectively manage environmental risks.**

## COMPLIANCE WITH LAWS AND REGULATIONS

Business Partners shall comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained, operational and follow the reporting requirements.

## NATURAL RESOURCES CONSERVATIONS

Business Partners shall conserve natural resources and engage in activities aimed at responsible water stewardship (including reducing water usage), energy consumption and greenhouse gas emissions. Business Partners shall have systems in place to quantify the amount of water used, energy consumed, waste generated and disposal mechanism, and greenhouse gases emitted by their operations.

## WASTE MANAGEMENT

Business Partners shall have systems in place to 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.

## SPILLS AND RELEASE

Business Partners shall have systems in place to prevent and mitigate accidental spills and releases into the environment.

# BUSINESS ETHICS & COMPLIANCE

Business Partners are expected to comply with applicable laws and regulations throughout their supply chain, in the countries in which they operate. They are expected to behave ethically and with integrity in their business activities, and interact transparently with healthcare professionals and organizations, patients and patients' organizations, policy makers, government officials or payers.

## ANTI-CORRUPTION

Business Partner, their employees or subcontractors shall not engage in or tolerate any form or corruption. They shall not accept, offer, or give, directly or indirectly through third parties, anything of value to any person (e.g., healthcare professional) or organizations (e.g., government agency), to obtain or retain business or to induce any undue advantage. Such improper benefits may comprise of cash, gifts, inappropriate monetary grants, or donations.

## HEALTHCARE COMPLIANCE TRAINING

Business Partners shall ensure that appropriate training is provided to all employees or staff who engage with healthcare professionals, healthcare organizations, patients, or patient organizations.

## CONFLICT OF INTEREST

Business Partners shall avoid situations that present or may create the appearance of a conflict between their interests and those of Ipsen, including potential conflict of interest with Ipsen employees. Business Partners shall declare any conflict of interest that may affect the performance of tasks or provision of services entrusted to them by Ipsen.

## ACCURATE BOOKS & RECORDS

Business Partners shall keep financial books and records in accordance with applicable legal, regulatory or fiscal requirements and follow accepted accounting practices.

## FAIR COMPETITION AND ANTI-TRUST LAWS

Business Partners shall conduct their business in compliance with applicable competition and anti-trust laws, upholding standards for fair and accurate business practices. This means, among other things, not to engage in price-fixing, market sharing, bid rigging, untruthful advertising.





# BUSINESS ETHICS & COMPLIANCE

## CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY PROTECTION

Business Partners shall safeguard and make proper use of Ipsen's intellectual property and confidential information. They shall obtain Ipsen approval before communicating or disclosing externally any information related to Ipsen.

Business Partners shall not use or share non-public information about Ipsen. Non-public information may include clinical trials data, corporate strategies, mergers and acquisitions, strategic contracts, court cases or changes in the top management. Buying or selling securities of the company while being aware of such non-public information is considered "insider trading" and therefore illegal.

## PRIVACY AND DATA PROTECTION

Business Partners shall respect individuals' personal data in a manner consistent with the rights to privacy and applicable data protection laws. They shall take appropriate precautions, and technical and organizational measures to protect personal information against loss, theft, misuse, unauthorized access, disclosure, alteration, or destruction.

## TRADE CONTROLS AND EXPORT CONTROLS

Business Partners shall comply with all applicable import and export controls, trade sanctions and other trade compliance laws of the countries in which they operate.

## ANIMAL WELFARE

Business Partners shall treat any animal used in their activities in an ethical manner, treated respectfully, with pain and stress minimized. Animal testing should be performed after consideration to replace animals, reduce the number of animals used or refine procedures to minimize distress.

## PRODUCT SAFETY AND QUALITY

Business Partners involved in the supply, manufacturing, packaging, testing, storage and distribution of materials/products on behalf of Ipsen shall ensure compliance with applicable Quality Regulations, Good Manufacturing Practices (GMPs) and Good Laboratory Practices (GLPs) for the markets in which the products are registered and distributed. Documentation or data relevant to activities performed must be original, accurate, legible, controlled, retrievable, and safe from intentional or unintentional manipulation or loss.

## CLINICAL TRIALS

Business Partners involved in clinical trial shall ensure compliance with all applicable regulatory requirements in the countries where clinical trials are conducted and where Ipsen's products are marketed, registered, and distributed. Business Partners shall adhere to relevant guidance on Good Clinical Practices (GCPs), issued by national and local regulatory authorities. Business Partners managing the clinical trials shall provide full visibility to Ipsen, of any subcontracted clinical trial activities.

# IT & OT SECURITY

**Business Partners shall manage and operate their activities in a safe and secure manner with IT (Information Technology) and OT (Operational Technology) security best practices to ensure business continuity and protection of Ipsen assets from a confidentiality, integrity, and availability perspective.**

## **SECURITY GOVERNANCE**

Business Partners Senior Executives shall be actively committed and involved in security governance, allocate proper funding and resources to achieve their security objectives.

## **ROBUST SECURITY FRAMEWORK**

Business Partners shall develop effective security processes, procedures, and standards, in line with applicable laws and regulations.

## **IT AND OT SECURITY STANDARDS AND INDUSTRY BEST PRACTICES**

Business Partners shall demonstrate commitment to cyber security standards and, where appropriate, on IT and OT domains obtain and maintain security certifications for services or products (for example ISO27001, SOC2, ISA 62443). Compliance with security policies shall be regularly audited. Corrective measures shall be followed up and continuous improvement enforced.

## **SECURITY TRAINING**

Business Partners shall provide appropriate security training to their staff to ensure knowledge and adherence to security policies.

## **SECURE SUPPLY CHAIN**

Business Partners shall ensure their own suppliers meet security requirements. Business Partners must provide safe and secure products, software, services, and materials according to requirements specified by Ipsen.

## **MANUFACTURING OPERATIONS AND R&D SITES**

Business Partners shall provide adherence to OT security and formally document all aspects of security controls during the implementation of production equipment or any system upgrades.

## **CYBER RESPONSE AND RECOVERY PROCESSES**

Business Partners shall have systems and processes in place to detect, prevent and mitigate potential cyber outage in the event of a major cyber incident to the environment that could jeopardize directly or indirectly Ipsen assets, data, or operations. Backup and restore procedures must be in place for all GxP and non GxP systems. Where relevant, security incidents must be reported to authorities and/or Ipsen.

# REPORTING CONCERNS

In the spirit of the principles in this Code of Conduct, anyone who knows or suspects that a Business Partner, Ipsen employee, or anyone acting on Ipsen behalf has engaged in improper activities that may violate this Code of Conduct, is encouraged to report the concern through the

**Ipsen Whispli Alert Platform**  
(anonymous and confidential line)  
or use the email address

**[Ipsen.Ethics.Hotline@ipсен.com](mailto:Ipsen.Ethics.Hotline@ipсен.com)**

The reports submitted through the email address will only be received by specific individuals in the Ipsen Business Ethics Department, entrusted with the management of alerts.

