

# Code of Conduct for Third Parties

**Working with AstraZeneca**

June 2025



At AstraZeneca, our company Values<sup>1</sup> 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 on our purpose to push the boundaries of science to deliver life-changing medicines.

**Pascal Soriot, CEO**  
AstraZeneca

<sup>1</sup>Our Values are a set of behaviours defined within our Code of Ethics



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# We do the right thing

One of AstraZeneca's core 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 our Code of Conduct that all third parties who work with us, for us, or on our behalf should follow. In addition to the basic requirements to follow the law and act with integrity, our Code of Conduct is part of our fundamental commitment to work only with others who embrace ethical standards consistent with ours.

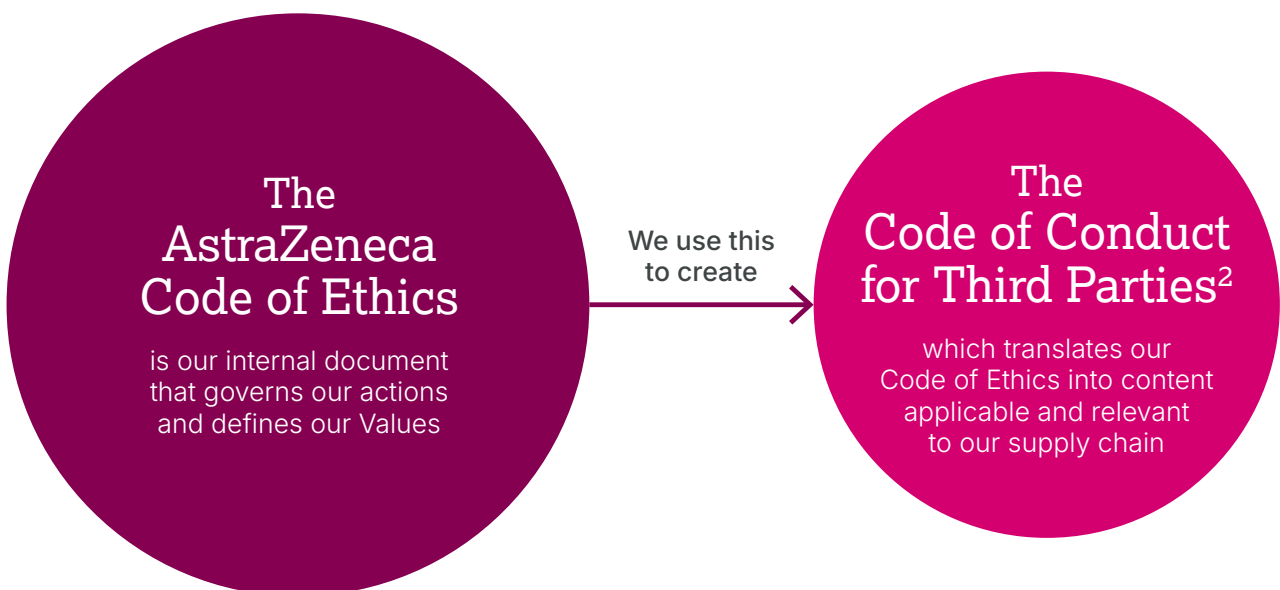
Before we contract with third parties, we assess them to determine whether their reputation and behaviour align with our Code of Conduct for Third Parties. We actively oversee our relationships to ensure third parties continue to maintain high standards, and we address any concerns or changes.

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 standards in this Code of Conduct 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 an inclusive supply chain through your procurement practices.

We commit 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 this Code of Conduct. Details about raising concerns are at the end of this document.



<sup>2</sup> Our Code of Conduct for Third Parties relates only to suppliers. It does not apply to HCP, HCO or customers

## Working together

To address the interconnected challenges facing the health of people, society and the planet, we're collaborating across and beyond the health sector, to drive positive change.

We're focused on:

### How we make a sustainable impact:

Through taking bold action on climate and nature to support the health of our planet; closing healthcare gaps and improving health equity; and strengthening health systems resilience to meet current and future health needs.

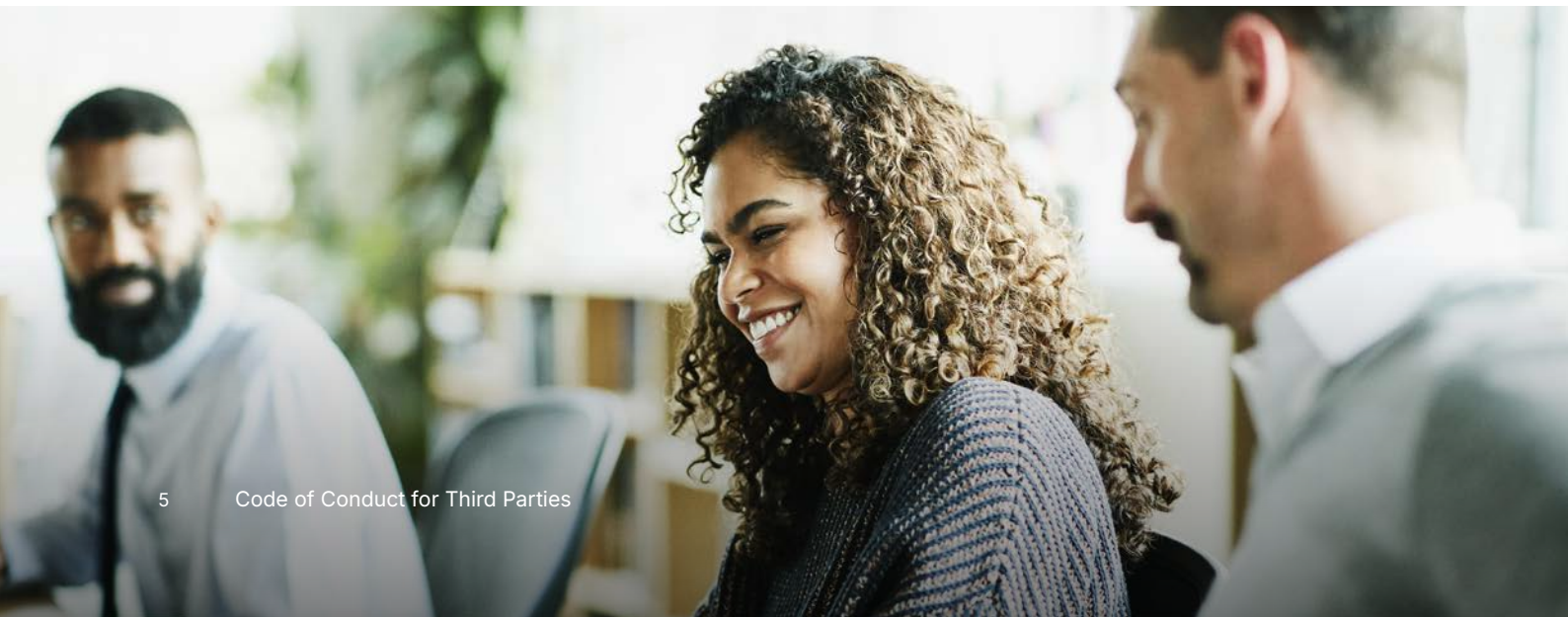
### How we do business:

We are guided by our Values and invest in our people to create long-term value, resilience and trust by operating responsibly, ethically and with robust governance.

We work closely with our 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.

AstraZeneca will want to work with you to evaluate the application of PSCI Principles and this Code of Conduct at your facilities or on sites operated by your suppliers.



# Ethics

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

## Anti-bribery and anti-corruption

**Corruption** is dishonest, fraudulent or otherwise unethical or illegal conduct by a person in a position of power or public trust (such as a public official) based on improper influence. Typically, it involves abusing entrusted power for individual or personal gain.

**Bribery** is a form of corruption involving the exchange of money or something else of value – whether directly or indirectly – to improperly influence the judgment or conduct of the intended recipient or beneficiary.

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, request, agree to receive or accept a bribe, and never permit, authorise, assist, advise or procure someone else to do so on your behalf.

Ensure you have in place, and maintain, adequate procedures designed to prevent your organisation and your employees, agents, subsidiaries or others who perform services for you or on your behalf ('associated persons') from engaging in any kind of bribery or corruption intending to obtain or retain business for AstraZeneca or to obtain or retain an advantage in the conduct of business for AstraZeneca.

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.

Only give appropriate items of value, hospitality, or contributions on behalf of AstraZeneca, or make payments on our behalf, 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 resources](#) and forms an integral part of our Code of Conduct for Third Parties and should be read as part of this document.

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

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## Anti-fraud

Do not commit fraud or do anything to facilitate it.

Ensure you have in place, and maintain, reasonable procedures to prevent your organisation and its associated persons from engaging in any kind of fraud to benefit (whether directly or indirectly) either: (a) AstraZeneca or (b) any AstraZeneca customer, client or others to whom your associated persons provide services on AstraZeneca's behalf ('AstraZeneca customers').

Never permit, authorise, assist, advise or procure services for your organisation or its associated persons to commit any kind of fraud intending to benefit (whether directly or indirectly) either AstraZeneca or AstraZeneca customers.

Report any outward fraud incidents as soon as possible to AstraZeneca, regardless of whether the fraud was successfully perpetrated or not.

Answer, in reasonable detail, any inquiry from us related to your procedures for preventing fraud.

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## Anti-tax evasion

Do not commit tax evasion or do anything to enable 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 resources](#) and forms an integral part of our Code of Conduct for Third Parties and should be read as part of this document.

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



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## 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.

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**Compete fairly.**



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## 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 goods and/or services.

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.

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



## Animal research and 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 resources](#) and forms an integral part of our Code of Conduct for 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

Business decisions must never be influenced by personal interests. 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 can meet all legal and regulatory requirements for doing so, including the use of EU Standard Contractual Clauses and completing a Transfer Impact Assessment.
- You 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 resources](#) and forms an integral part of our Code of Conduct for Third Parties and should be read as part of this document.

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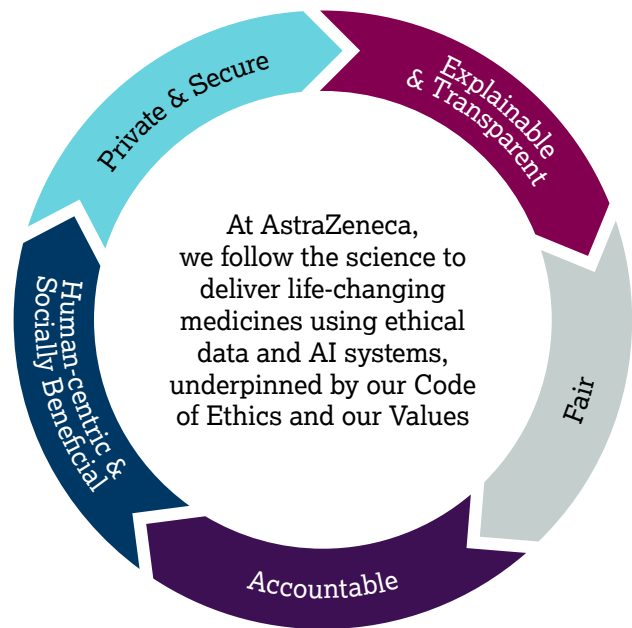
## Protect AstraZeneca personal data and confidential information.

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## 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 and AI intended to provide ethical guidance on all aspects of Artificial Intelligence use. This will help ensure that AI solutions meet AstraZeneca's requirements. Our standards, which we expect third parties to meet, are set out in five principles stated in our [Data and AI Ethics](#) webpage under [Ethics and Compliance](#).



## 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.
- Incident management.

## Confidentiality

Make sure any communication of confidential information is authorised, limited only 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.
- 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 information sharing, 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 authorised you to do so. If you have been authorised to communicate about our products, key requirements are:

- 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 resources](#) and forms an integral part of our Code of Conduct for Third Parties and should be read as part of this document.

## Sustainable sourcing and traceability

Source all materials responsibly and ethically. Conduct due diligence through all levels of your supply chain on your sources of natural raw materials, particularly those identified in [Sustainable Use and Sourcing of Raw Materials](#).

Assess, disclose and work to minimise environmental and social impacts associated with the extraction, production and processing of natural raw materials.

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

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Ensure natural raw materials are sourced in accordance with the appropriate raw materials certification standards identified in [Sustainable Use and Sourcing of Raw Materials](#) and provide source of origin for materials when requested.

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, forest degradation, or conversion 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 Sustainable Use and Sourcing of Raw Materials and our Approach to Minerals Statement are available on our website under [Sustainability resources](#) and form an integral part of our Code of Conduct for Third Parties and should be read as part of this document.

# Human and labour rights

We expect you to uphold internationally recognised human and labour rights of workers and treat them with dignity and respect in line with standards including the UN Guiding Principles, International Labour Organization (ILO) and Ethical Trading Initiative (ETI) Base Code.

## Human rights

Always respect human rights. Everyone is entitled to basic rights and freedoms wherever and whoever they are. This means you must uphold the human rights of others and address adverse human rights impacts where these have been identified. The responsibility to respect human rights is a global standard of expected conduct for all businesses wherever they operate. Addressing adverse human rights impacts requires taking adequate measures for their prevention, mitigation and where appropriate, remediation.

## Freely chosen employment, anti-slavery and anti-trafficking

AstraZeneca is committed to ensuring that modern slavery or human trafficking are not tolerated in any part of our business, or our supply chains. Make sure you comply with human rights and employment laws in the jurisdictions in which you work. Where the Code of Conduct for Third Parties covers the same subject as the law, the provision that gives workers greatest protection should be applied. Make sure you have robust means of ensuring that the subcontractors at all levels of your value chain also comply. Some examples of best practice could include:

- A policy commitment to meet your responsibility to prevent modern slavery and human trafficking.
- A due diligence process to identify, prevent, mitigate and respond to risks of modern slavery.

- Providing training on modern slavery to all workers, including the types of modern slavery, how to spot the signs and reporting pathways.
- A duty to report any actual or suspected cases of modern slavery to AstraZeneca.
- Expectation for your suppliers and third parties to include modern slavery prevention and information in training, induction materials and worker handbooks.

Information about modern slavery and reporting channels should be made available on sites, in languages reflecting the languages of the workers, and displayed in confidential areas (e.g. back of toilet doors).

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.

Employ only those who freely chose 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 or lodge "deposits" or their identity papers with their employers.

Never charge workers and jobseekers any fees, related recruitment costs or any extra costs associated with recruitment.

Promptly report to AstraZeneca all concerns and issues related to Modern Slavery and Human Trafficking identified in your business and supply chain. We encourage anyone to report in good faith any concerns regarding modern slavery and human trafficking as well as any other compliance risks without fear of retaliation (as detailed in the [Speak up section](#) of this document).

Men, women and children of all ages, backgrounds and identities can become victims of modern slavery. People in situations of poverty, facing food insecurity or lacking access to education, finance, housing and healthcare can be the most vulnerable. Women and girls can be especially at risk in addition to people in informal, seasonal/temporary or low-skilled roles, particularly migrant workers.

Victims may not be aware of their rights, may have been accustomed to harsh treatment or not realise that they have become victims of modern slavery. Concerns about losing work, repercussions on themselves or their family members and friends, or perceived fear of authority figures may hinder victims raising abusive treatment with colleagues or official bodies.

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

- Forced to work, through mental or physical threat.
- Forced to work to repay a debt.
- 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'.
- Physically constrained or restricted from free movement against their will or with the constrictor's knowledge and intent to enslave or traffic; and/or
- In compulsory prison labour put at the disposal of private individuals or companies.

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.

## Spotting the signs of modern slavery and forced labour

Those affected are unlikely to self-identify as a 'victim' and may not realise or accept they are being controlled.

For more information on how to spot the signs of Modern Slavery and Forced Labour please see the [ETI Base Code Guidance: Modern Slavery](#).

Our Modern Slavery Statement is available on our website under [Sustainability resources](#) and forms an integral part of our Code of Conduct for Third Parties and should be read as part of this document.

## Child labour and young workers

Never use child labour.

Ensure there is no new recruitment of child labour. Develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child.

Use workers under the age of 18 only for work that is not harmful to them and does not interfere with their compulsory education. Never employ workers under the age of 18 for night work or any type of work that is hazardous or carried out in a way likely to jeopardise the health, safety or morals of young persons.

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.

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**Never use child labour.**



## **Inclusion and diversity**

Inclusion and diversity are fundamental to the success of our company, because innovation requires breakthrough ideas that come from a diverse workforce and 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 with us the inclusion policies and practices within your workforce and supply chain, so together we can enhance the power of inclusion for innovation.

## **Supplier inclusion and diversity**

We are committed to ensuring an inclusive supply chain through our Supplier Diversity Programme. We expect our suppliers to employ inclusive and transparent procurement practices and to provide equal access to opportunities to small businesses.

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**Unlock innovation through  
the power of diversity.**

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## **Non-discrimination**

Maintain a workplace culture of inclusion, diversity and equal opportunity that is free of any form of unlawful discrimination, and make sure you do not tolerate or condone discrimination based on legally defined (under UK and EU law) protected characteristics. Including discrimination based on age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex and sexual orientation.

Decisions about recruitment, reward, development, and promotion must be made solely on 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.

Adopt and implement a workplace policy on violence and harassment.

Take into account violence and harassment and associated psychosocial risks in the management of Occupational Health & Safety.

Identify hazards and assess the risks of violence and harassment with workers and their representatives and take measures to prevent and control them.

Provide training to workers in accessible formats on the risks of violence and harassment and the associated prevention and protection measures.

## 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 are not excessive and 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.
- Where possible make sure regular employment is provided. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship must not be avoided through the use of labour-only contracting, sub-contracting, or home working arrangements or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment.
- Workers should be provided with at least one day off in every 7 day period or where allowed by national law 2 days off in every 14 day period.

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

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## 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. Where the right to freedom of association is restricted under law, you should facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

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 resources](#) and forms an integral part of our Code of Conduct for Third Parties and should be read as part of this document.

# Health and safety

We have a company standard to maintain a safe work environment, support healthy employees and protect the planet. We expect you to have the same commitment.

## Worker protection

Maintain a health and safety culture aligned with Human and Organizational Principles (HOP), based on the view that error is normal, blame fixes nothing, context drives behaviour, learning is vital and how leaders react matters.

Promote continuous improvement of occupational safety and health to prevent occupational injuries, diseases and deaths, by the active development, in consultation with representative organisations of employers and workers, of policies, systems and programmes of education, training and application of safe and healthy working practices.

Protect people from unhealthy exposure to physical, psychological, chemical, or biological hazards.

Make information available about risks associated with safety, health, and the environment, including chemicals and 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.

Ensure a robust process is in place to report and investigate Health and Safety events or near misses, including action item follow through to prevent reoccurrence.

Our Safety, Health and Environment (SHE) Standard is available on our website under [Sustainability resources](#) and forms an integral part of our Code of Conduct for Third Parties and should be read as part of this document.

## 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.

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

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# Environment

We expect you to operate sustainability 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 a supplier to the Pharmaceutical and Life Sciences sector, which delivers life changing medicines for patients, work to understand and minimise the environmental impact of the products and services you supply to AstraZeneca and report data publicly or provide data to allow AstraZeneca to report on their environmental footprints.

## Climate action

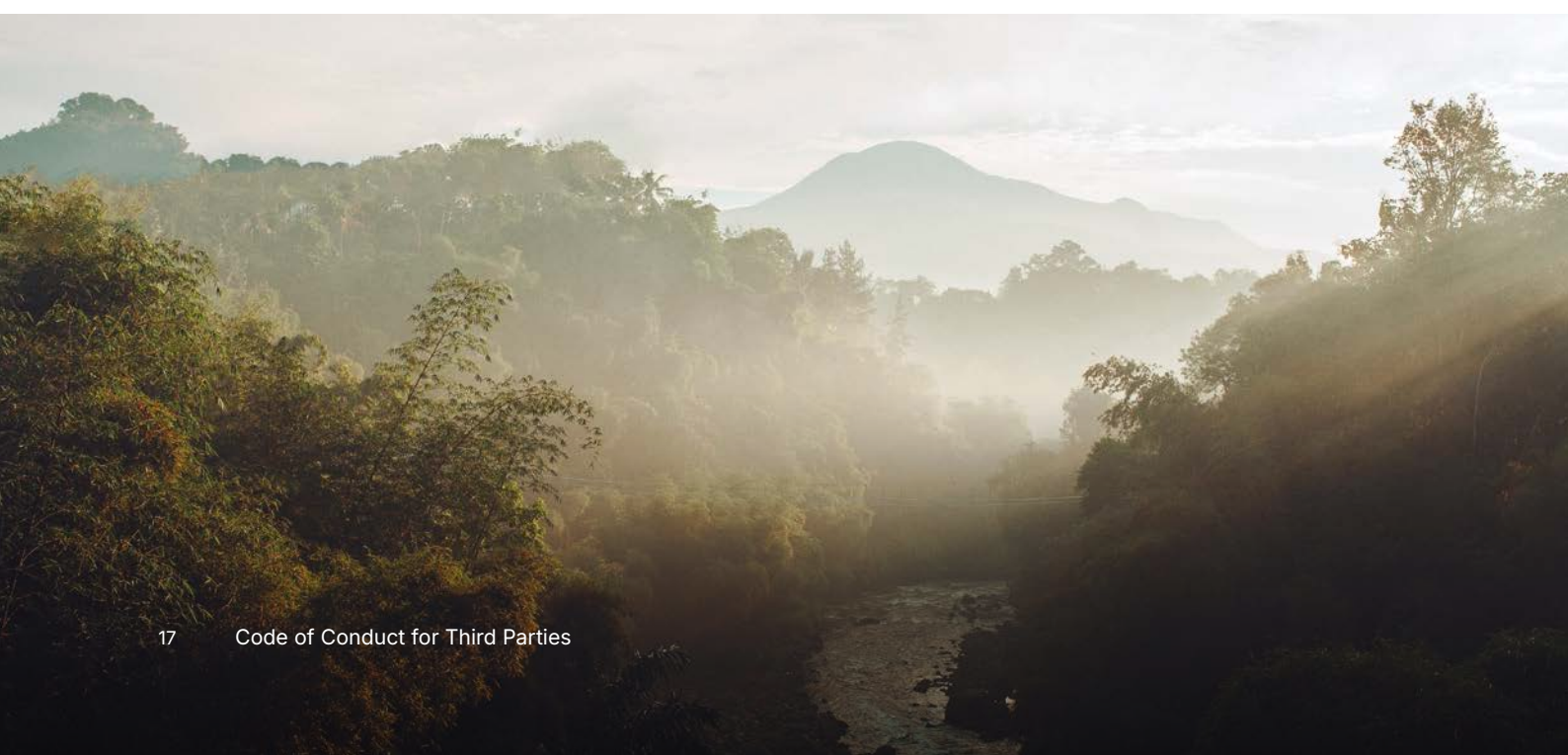
Understand and work to minimise emissions of greenhouse gases (identified by the Greenhouse Gas Protocol) from your own operations (Scope 1 and 2) and through your value chain (Scope 3) by setting science based targets, using the frameworks defined by Science Based Targets initiative (SBTi) and Greenhouse Gas Protocol.

Minimise the use of energy in your operations and obtain the energy you continue to need from renewable sources. Consider making a public commitment to use renewable energy through RE100.

Work to reduce your greenhouse gas emissions across Scopes 1, 2 and 3 and plan to achieve net zero emissions before 2050.

Encourage and support your supply chain to take similar climate actions in the same time frame.

Understand the physical risks to your business and your supply chains 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 approach to Pharmaceuticals in the environment is available on our website under [Sustainability resources](#) and forms an integral part of our Code of Conduct for Third Parties and should be read as part of this document.

## Resource use

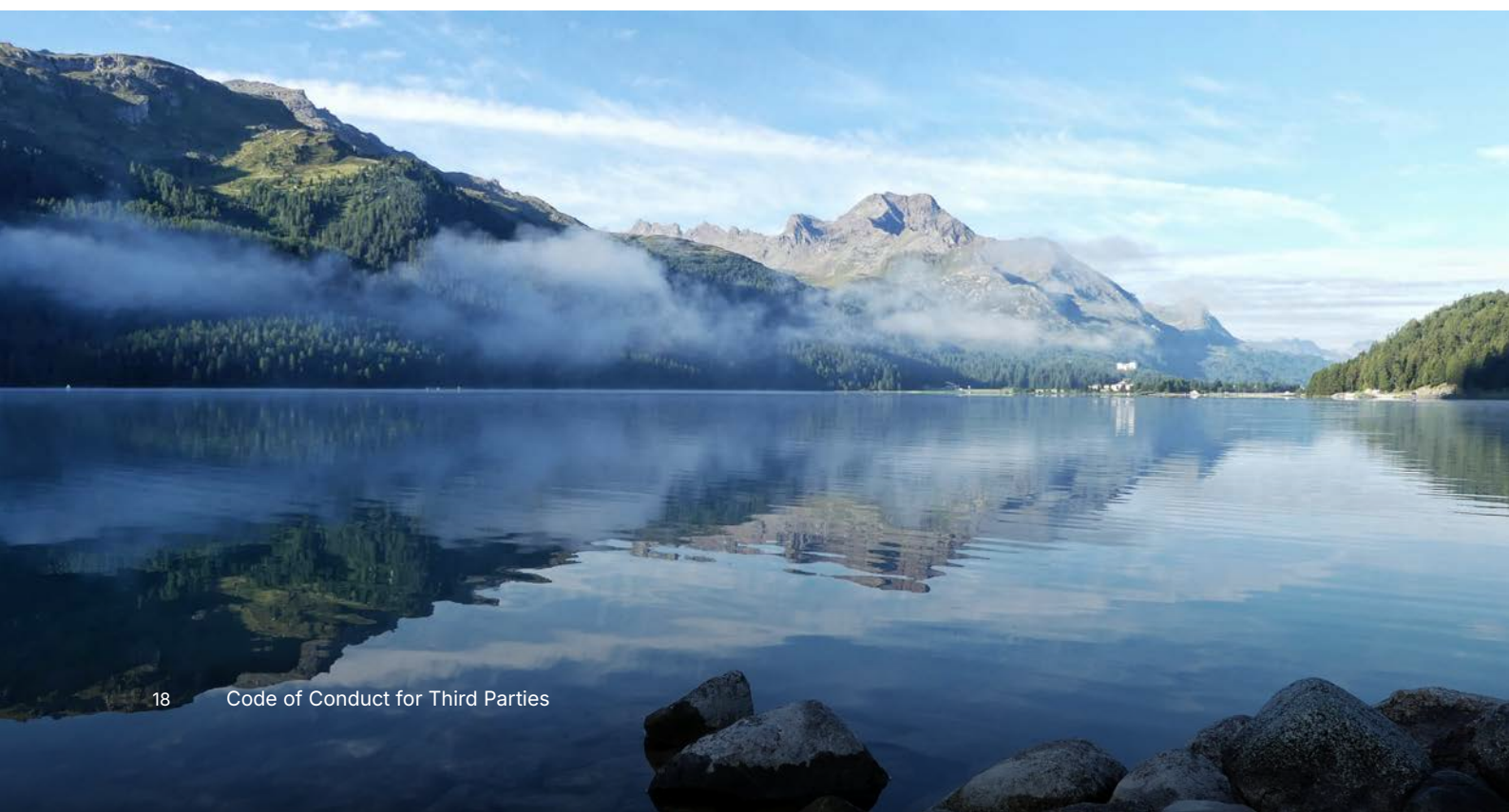
Take steps to conserve water, energy, and other natural resources, continuously improving efficiency and reducing resource consumption.

Our approach to biodiversity and water stewardship are available on our website under [Sustainability resources](#) and form an integral part of our Code of Conduct for Third Parties and should be read as part of this document.

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**Operate responsibly to protect people and the planet.**

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# Management systems and reporting

We expect you to promote an ethical business culture, maintain business continuity and facilitate continuous improvement and compliance with this Code of Conduct.

## Commitment and accountability

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

## Legal 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.

## Managing your third parties

Conduct relevant due diligence and risk assessment for third parties you work with and ensure that they comply with all applicable laws, regulations, codes, standards and are committed to sustainability and an ethical business culture.

## Risk identification and management

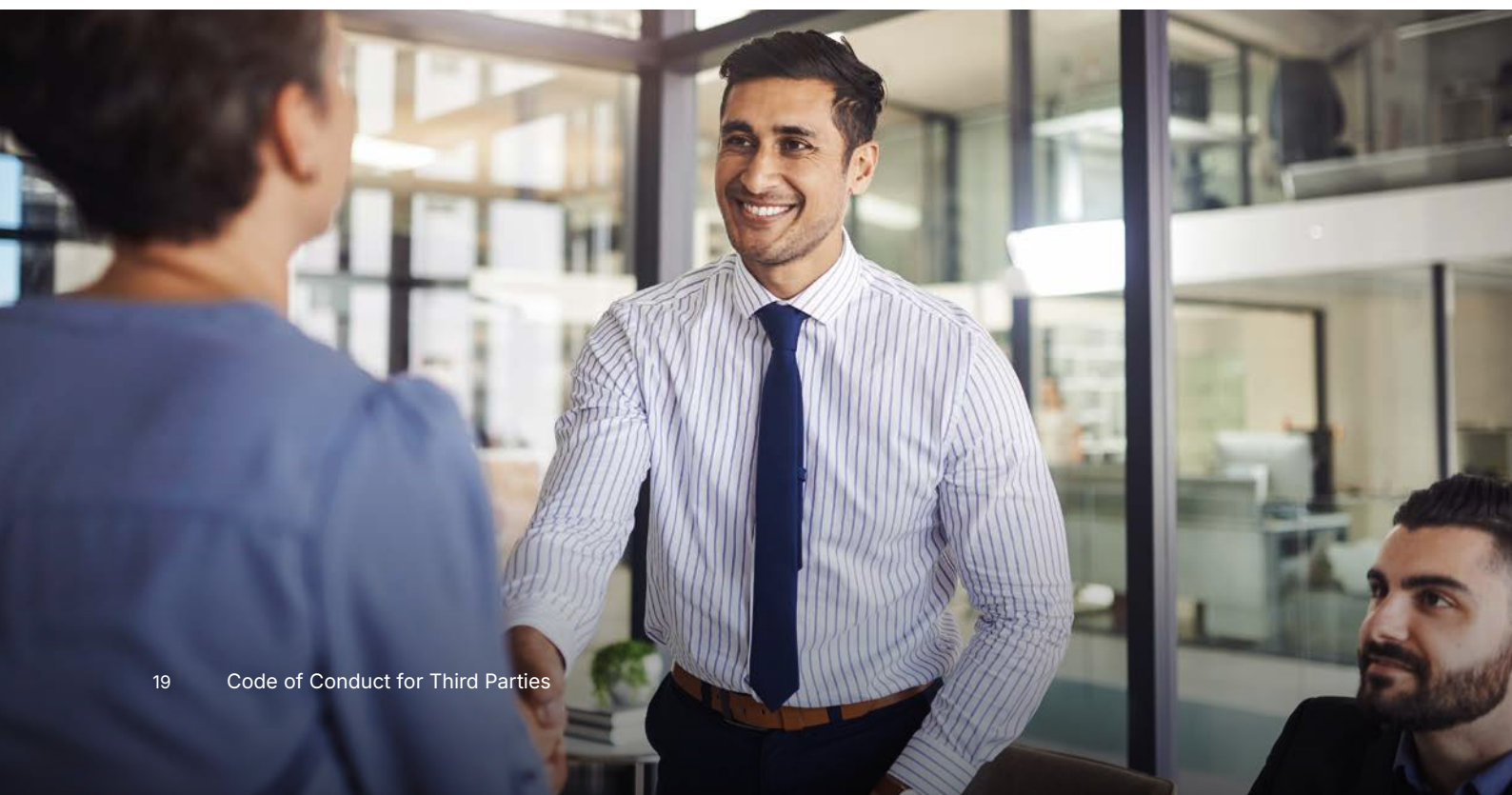
Make sure you have mechanisms in place to assess, mitigate and manage risks in all areas addressed in this Code of Conduct.

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 this Code of Conduct related to your operations or supply chain.



## Sustainability

Working in partnership with all our stakeholders, we're tackling the major issues of our time, driving positive impact across our value chain to build a healthy future for people, society, and the planet.

We expect you to operate your business and work with AstraZeneca to support the delivery of more sustainable, equitable, resilient and net zero healthcare.

## Materiality assessment

Our materiality assessments guide 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 Sustainability Materiality Assessment is available on our website under [Sustainability resources](#).

Our expectation is that all third parties who we work with will demonstrate a focus on sustainability issues which are aligned with our ambition. We will look to work with third parties who 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 are working in compliance with this Code of Conduct for Third Parties and comply with applicable regulations and reporting requirements to AstraZeneca.

To support improved transparency in our supply chains and the decarbonisation of our business, we expect third parties to publicly commit to set science based targets for the reduction of greenhouse gas emissions and obtain validation of targets via the Science Based Targets initiative (SBTi), annually report ESG information to EcoVadis and annually report carbon data and action insights to CDP.

## Communication, training, and competency

Make sure you have effective methods in place to communicate this Code of Conduct for Third Parties 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 requirements. Maintain records of training that can be shared with AstraZeneca.

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Communicate this Code of Conduct for Third Parties to your employees and your supply chain.

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## Continuous improvement

Set performance objectives that drive continuous improvement across all aspects of the Code of Conduct for Third Parties, and take actions needed to correct any identified deficiencies. Our expectation is that third parties are committed to continuous improvement of ethical and sustainable business performance throughout our partnership.

This Code of Conduct for Third Parties 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 requirements to your supply chain, to hold your own third parties to equally high standards.

## Identification and reporting of concerns

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

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](http://www.AZethics.com)

### Telephone

Find the telephone number(s) for your country at [www.AZethics.com](http://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](mailto: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.

\* Previous versions of this document were called the 'Expectations of Third Parties' and your contract with AstraZeneca may refer to this document using that previous name