LEO Pharma

Third Party Code of Conduct

Date: March 2026

Introduction

At LEO Pharma, integrity is one of our core values. We acknowledge that our performance is not only measured by the results we achieve, but also by how we achieve these results. We actively assess and improve our supply chain's social and environmental impact. We take pride in our business ethics and we expect our suppliers, licensees, and distributors to share these values. In doing so, we are committed to creating value for our broader stakeholders, including our employees, patients, business partners, and the communities in which we operate.

Compliance, audit and termination rights

At LEO Pharma, our patients and customers expect consistent and ethical behavior from all the parties, partners, and suppliers we work with. The LEO Pharma Code of Conduct outlines our values and principles for business conduct. The Third Party Code of Conduct (hereafter, the Code) supports the LEO Pharma Code of Conduct by setting the standards that we require of our suppliers which includes but is not limited to suppliers, manufacturers, contractors, distributors, wholesalers, transportation partners and any other entity supplying goods and/or services, their employees, agents, and subcontractors (hereafter, the Supplier) to follow when conducting business on behalf of LEO Pharma. The Supplier must communicate the Code to their employees, agents, and subcontractors (including proper training and inclusion into materials and processes) and ensure compliance with local and national laws and regulations. By agreeing to the Code, the Supplier commits to ensuring that all agreements and business relationships with LEO Pharma comply with the provisions outlined herein.

Legal compliance: The Supplier must comply with all applicable laws and regulations. The Code sets out the behavior LEO Pharma expects the Supplier to adopt beyond laws and regulations.

Audit rights: LEO Pharma conducts regular scheduled screenings of Suppliers. Suppliers must show evidence of compliance with the Code, cooperating with assessment and monitoring activities, which may include self-assessments, questionnaires, interviews, desktop assessments, audits, or other necessary measures, including human rights due diligence activities.

Termination rights: LEO Pharma expressly reserves the right to terminate any potential or existing business relationship with the Supplier, if:

- There is unwillingness to cooperate on assessments and evaluation in relation to the Code, or
- There is unwillingness to work on improving processes to manage risk of negative impact in relation to ethics, human rights, labor, health and safety, and environment, or
- The Supplier fails to comply with the Code.

Ethics & Integrity

Anti-corruption: The Supplier is prohibited from engaging in corruption, bribery, extortion and embezzlement. The Supplier must not pay or accept bribes or participate in illegal inducements in business or government relationships, including through intermediaries. The Supplier must have processes in place to prevent corruption and comply with applicable laws.

Fair competition and marketing laws: The Supplier must conduct business fairly, competitively, and in compliance with anti-trust laws to ensure balanced market conditions. Fair business practices, including accurate and truthful advertising, are required.

Export controls and trade sanctions: The Supplier must adhere to all governing export control and trade sanction regulations.

Animal welfare: Animal experimental work should be performed after consideration to replace and reduce the use of animals and refine the procedures performed on experimental animals to minimize distress. As a minimum requirement, all animal experimental work and care must comply with the standards set by EU and Danish legislation, regardless of where the use of animals is taking place.

Data privacy and security: The Supplier must safeguard and make only proper use of personal information to ensure that data subjects' privacy rights are protected. Data subjects may be employees, patients, participants or other natural persons. The Supplier must comply with applicable privacy and data protection laws and ensure the protection, security, and lawful use of personal information.

Confidentiality: The Supplier must maintain confidential information in strict confidence and shall protect confidential information from misuse or disclosure with at least the same degree of care it uses to protect its own confidential information, however at least corresponding to usual industry standard.

Intellectual property rights: The Supplier must fully respect and abstain from infringement or violation of any intellectual property rights belonging to LEO Pharma or any other companies or individuals.

Patient safety and access to information: The Supplier must ensure adequate management systems are in place to minimize the risk of adversely impacting the rights of patients, participants and donors, including their rights to health and to access information directly.

Conflicts of interest: The Supplier must avoid and manage conflicts of interest. The Supplier must declare any conflict of interest that may act the performance of tasks or provision of services to LEO Pharma.

Clinical trials: Clinical trials must always be conducted in accordance with Good Clinical Practices and other applicable laws, regulations, and international standards. Participation by study participants is subject to prior informed consent.

Responsible sourcing of minerals: The Supplier shall ensure that any sourcing of minerals or metals in their supply chain are from responsible and conflict-free sources only.

Labor & Human Rights

The Supplier must adhere to all international human rights treaties, including the International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, preventing and mitigating negative human rights impacts linked to their operations, including through sub-contractors.

Child Labor: The Supplier must not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above the country's legal age for employment, or the age established for completing compulsory education.

Forced labor: The Supplier must not use forced, bonded, or indentured labor or involuntary prison labor. No worker shall pay for a job or be denied freedom of movement.

Non-discrimination: The Supplier must provide a workplace free from discrimination. There shall be no discrimination for reasons such as race, color, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status.

Violence and harm: The Supplier must ensure a workplace free from harassment, abuse, and inhumane treatment, including sexual harassment and violence, abuse, corporal punishment and verbal or physical coercion.

The Supplier must offer decent working conditions to their employees. The ILO defines decent work as "productive work for women and men in conditions of freedom, equity, security and human dignity".

Wages, benefits, and working hours: The Supplier shall pay workers according to wage laws, including minimum wages, overtime, and mandated benefits. The Supplier must communicate if overtime is required and the wages for it, ensuring overtime aligns with national and international standards.

Freedom of association and bargaining: The Supplier must respect workers' rights to associate freely, join or not join unions, seek representation and join workers' councils. Workers must be able to discuss working conditions and compensation with management without fear of retaliation, reprisal, intimidation or harassment.

Health & Safety

Workplace environment: The Supplier shall ensure a safe and healthy working environment with potable drinking water, adequate sanitation, essential safety equipment, emergency medical care access and well-lit, equipped workstations. The above is also required for any company-provided living quarters.

Worker Protection: The Supplier must protect workers from exposure to chemical, biological, physical and ergonomic hazards, to avoid work related injuries in the short and long term.

Process safety, authorizations and reporting: The Supplier is expected to have a proactive approach to safety including risk assessments, systems for capturing and reducing hazards and reporting of accidents. The Supplier must have management processes in place to identify risks from chemical and biological processes and to prevent or respond to the release of chemical or biological agents. The Supplier must comply with all local and international health and safety regulations, including acquiring work permits and licenses, information registrations, ensuring restrictions are obtained and by following operational and reporting requirements.

Emergency preparedness and response: The Supplier shall identify and assess emergency situations in the workplace and any company-provided living quarters and minimize their impact by implementing emergency plans and procedures.

Hazard information: Safety information relating to hazardous materials - including pharmaceutical compounds and pharmaceutical intermediate materials - must be available to educate, train and protect workers from hazards.

Environment

The Supplier shall operate in an environmentally responsible manner to minimize adverse impacts on the environment, including natural resource conservation, avoidance of hazardous materials where possible and by engaging in reuse and recycling activities. The Supplier must comply with all applicable environmental regulations and obtain the applicable permits.

Waste: The Supplier is expected to apply a sustainable approach to the safe handling, movement, storage, disposal, recycling, reuse, and management of waste and wastewater discharges.

Spills and releases: The Supplier is expected to have systems in place to prevent and mitigate accidental spills and releases into the environment and adverse impacts on the local community. This includes managing the release of active Pharmaceuticals into the Environment (PIE).

Climate and air emissions: The supplier is expected to reduce their negative impact on the environment by setting climate targets and working actively on reducing their CO2 emissions.

Management systems & ongoing improvement

The Supplier shall use management systems to maintain business continuity, facilitate continuous improvement and compliance with the expectations of the Code. This includes the appropriate allocation of resources and mechanisms to identify and manage risks, the maintenance of necessary documentation for compliance and conformance, the establishment of training programs, the implementation of continual improvement plans, the assurance of grievance/ reporting of concerns without fear of reprisal and the assurance of adherence of the Code to workers and contractors.