# PHARMIX, s.r.o.

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# CODE OF ETHICS FOR BUSINESS PARTNERS

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# **Preamble**

PHARMIX, s.r.o. accepts this Code of Ethics which regulates the basic principles of conduct of our employees, our company and the expected conduct of our partners. By this act, our company expresses to the public an active attitude towards compliance with the law, ethical conduct and transparency in relations with business partners.

Custom manufacturing from small projects to large stainless steel machines for pharmaceutical, chemical and food industry - that is PHARMIX, s.r.o. The company's vision is to create cutting-edge and safe solutions for industries. We specialize in stainless and stainless steel processing with an uncompromising focus on quality. Each product carries carefully crafted details and a guarantee of reliability. All while being safe, socially sustainable and environmentally responsible.

We advocate open communication. We are ready to provide all available information responsibly, seriously, truthfully and in a timely manner. We respect the agreed conventions, which are always in accordance with applicable laws, standards and regulations, agreed terms and conditions and general rules of good conduct.

This Code of Conduct for Business Partners sets out the minimum standards that we expect our customers, suppliers and other parties ("partners") to adhere to. These standards apply to permanent and temporary employees, student employees and any other employees. These include, but are not limited to, the following standards:

- Compliance with relevant applicable legislation
- Avoiding conflicts of interest
- Active and effective fight against all types of corruption and bribery
- Prohibition of forced and child labour
- Respect for human dignity
- Fair working conditions
- Taking responsibility for employee health and safety
- Environmental protection
- Discretion

PHARMIX, s.r.o. reserves the right to change these requirements for its partners and expects its partners to respect the relevant changes. Acceptance of this Code of Conduct for Business Partners or its contents is a prerequisite for all contractual arrangements between PHARMIX, s.r.o. and its partners.

#### **Business ethics**

#### a) General principles

The Partners are obliged to comply with the applicable laws and all other relevant regulations in the countries where they operate and to perform their duties faithfully. Partners are also expected to demonstrate honesty and integrity in all aspects of their business activities and to commit to social responsibility with respect to all their business activities.

#### b) Conflict of interest and corruption

When dealing with partners and state institutions, the interests of the company and the private interests of employees on both sides must be strictly separated. Negotiations and decisions must be made independently of aspects that are not related to the matter at hand and in which personal interests are involved. Applicable criminal laws relating to corruption must always be observed. Among other things, the following must be observed:

#### **Criminal offences in dealing with public officials:**

Partners and their employees are not permitted to offer, promise, endorse or provide personal benefits (in particular, personal benefits such as payments and loans, including the repeated giving of small gifts over a prolonged period of time) to public officials (such as government officials, civil servants or political party officials) in the context of official negotiations that have not yet been clearly decided, for the partners or for themselves or for third parties.

#### **Criminal offences in commercial relations:**

It is not permitted to offer, promise, give or endorse personal benefits in exchange for a favourable position in a business deal. Personal benefits may not be solicited even in negotiations with partners. Partners must require their employees not to allow or accept such benefits to be promised to them.

No employee may accept anything of value - especially in the form of a personal gift (in excess of CZK 1,500) or a benefit arising from a business relationship with PHARMIX, s.r.o. - that could be considered to have a potential influence on business decisions or transactions. Therefore, it is not allowed for the management and employees of partners to provide, promise or offer anything of value to employees of PHARMIX, s.r.o. Nor may the management and employees of the Partners accept such value from a PHARMIX, Ltd. employee. The invitation must be within the bounds of normal business hospitality.

#### (c) Competition

The principles of fair competition must be respected. Partners must not act in a way that is or could be construed as excluding, restricting or distorting competition. All activities must comply with applicable laws that promote and encourage competition, in particular applicable antitrust and competition laws. In dealing with competitors, these provisions prohibit, in particular, collusion and other activities aimed at influencing prices or

conditions, allocating sales territories or customers, or using prohibited means to prevent free and open competition. They also prohibit agreements which restrict the freedom of customers to determine their prices and resale terms independently.

#### d) Money laundering

Partners will ensure compliance with all laws that prohibit money laundering or the financing of illegal or illegitimate activities. Partners guarantee to conduct business only with reputable business partners engaged in legitimate business activities and with funds obtained from legitimate sources.

#### (e) Intellectual property and asset protection

Partners must respect the confidentiality of information concerning PHARMIX, s.r.o. and its stakeholders. This information must not be disclosed to anyone who is not entitled to it. Partners must oblige their employees to protect trade and company secrets. Confidential information or confidential documents may not be disclosed to third parties without proper authorization, nor may they be disclosed in any other form unless proper consent has been given or unless the information is publicly available.

Partners are obliged to respect the property of PHARMIX, s.r.o. and its stakeholders. Employees of the partners may use the property of PHARMIX, s.r.o. and others only if they are authorized to do so. Partners must not tolerate theft of property. PHARMIX, s.r.o. property and equipment must not be misused, damaged or lost.

#### f) Responsible sourcing of raw materials

Partners are obliged to ensure that goods and materials do not come from dubious or illegal sources. They are obliged to implement measures for responsible sourcing of goods and materials to ensure compliance with the law. The purchase and trading of regulated conflict minerals (in particular tantalum, tin, tungsten, gold or their derivatives considered conflict minerals) is not permitted. Business partners must ensure that PHARMIX, s.r.o. is not supplied with any goods containing metals based on conflict minerals from conflict areas where their purchase directly or indirectly supports or finances armed groups.

# Management system

Partners are obliged to ensure that the regulations and content of this Code of Conduct for Business Partners of PHARMIX, s.r.o. are complied with in their company, either through the implementation of an appropriate management system or through traceable evidence that all relevant issues are an integral part of the company's corporate culture.

Partners are free to establish for themselves and their employees their own code of ethics, which

however, shall not limit the provisions set forth in this Code of Conduct for Business Partners. They are required to inform their employees of the provisions that govern the Code of Conduct for

business partners of PHARMIX, s.r.o., and the obligations arising therefrom.

PHARMIX, s.r.o. reserves the right to check compliance with this Code of Ethics at any time and without prior notice or to have such compliance checked by an independent third party. This control will be carried out in accordance with the relevant applicable legislation.

If a violation of applicable law or this Code of Conduct is found, it must be reported to inform PHARMIX, s.r.o. immediately. In the event of any violation of applicable law or this Code of Ethics, PHARMIX, s.r.o. reserves the right to terminate the contractual relationship.

# Labour and human rights

PHARMIX, s.r.o. requires partners to respect the human rights of all employees and to treat them with dignity and respect as required by the International Labour Organization (ILO). Partners must uphold the UN human rights conventions and ensure fair working conditions for all persons working in their workplaces and supply chain. The partners' employees are obliged to ensure that these universally recognised fundamental rights are respected.

#### a) Forced labour

Partners are obliged to refuse any form of forced labour. No employee shall be forced to work, directly or indirectly, through the use of force and/or intimidation. Only persons who have voluntarily chosen to work may be employed. PHARMIX, Ltd. does not tolerate any form of slavery, human trafficking, debt bondage or involuntary prison labor in its supply chain.

#### b) Child labour

The partners shall respect the United Nations human rights regulations and in particular children's rights. PHARMIX, s.r.o. requires from all partners zero tolerance towards any kind of child labour in the company and in the supply chain. This applies to all phases of production. The minimum age for employment must not be lower than the age at which compulsory schooling ends and in no case lower than 15 years or any higher minimum age set by local law. In particular, the partners undertake to comply with the ILO Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour. If national legislation on child labour requires stricter measures, they will take precedence.

#### b) Fair working conditions and remuneration

Partners shall ensure that the wages and benefits of their employees and subcontractors are fair and in accordance with applicable national and local laws and contractual arrangements. They shall also ensure that the maximum permissible working hours set in the respective country are respected. If the countries in which we operate have regulations that do not comply with our standards, we will work with our partners to develop approaches that take into account regional framework conditions.

#### c) Decent treatment and combating discrimination

PHARMIX, s.r.o. requires all partners not to tolerate unacceptable treatment of employees, such as corporal punishment or torture, sexual harassment or abuse, psychological or physical coercion, or the threat of such treatment. Partners must not exploit anyone. They must not conduct business with a company, person or organisation that does not respect human rights standards and principles.

The partners must commit to fight all forms of discrimination within the framework of applicable laws and provisions. They will ensure equal treatment and equal opportunities for employees, job applicants and business partners. We also call on partners to create an atmosphere of mutual respect and to strongly oppose any discrimination based on aspects such as race, religion, gender, sexual identity, social origin, ideology, political views, trade union membership, age, disability and personal or social circumstances.

#### (d) Freedom of association

Partners must respect the rights of their employees to associate within the framework of applicable laws. Partners are required to maintain open and constructive communication with their employees and employee representatives. Partners must respect the right of their employees to assemble freely, join unions, participate in collective bargaining and form works councils, in accordance with local laws. It must be ensured that all employees can communicate openly with management about working conditions.

#### e) Privacy

Partners must respect the right of their employees to the protection of their personal data. Furthermore, Partners must ensure that all use of personal data - such as collection, registration, retention and disposal - is carried out in accordance with applicable law.

# Health and safety

Partners must continuously strive to create a work environment that promotes health and safety. The partners are obliged to ensure, within the framework of national legislation, the protection of

workers in the workplace and health protection.

#### a) Occupational health and safety

PHARMIX, s.r.o. requires its partners to provide a safe and healthy environment for their employees. Partners must continuously identify safety risks and update preventive measures. They are responsible for strict compliance with PHARMIX, s.r.o.'s health and safety standards and applicable legislation in this area. All employees must be provided with adequate training and proper equipment prior to commencing work to enable them to carry out their work safely. In addition, all employees have the right and obligation to immediately stop unsafe work.

#### b) Prevention and emergency preparedness

PHARMIX, s.r.o. requires partners to ensure safe work processes, adequate controls and preventive maintenance to minimize all types of health and safety risks in the workplace. In this context, partners are expected to evaluate production processes and machinery for health and safety risks. The impact of identified risks is to be minimised by implementing emergency procedures. Partners must report all health and safety incidents related to PHARMIX, Ltd. projects, workplaces or construction sites.

# **Environmental protection**

Partners are obliged to promote environmental objectives in a sustainable manner. They must comply with laws and international standards as well as customer requirements for environmental protection. All necessary official permits, licenses and registrations must be secured and maintained. Partners shall support efforts to minimize adverse environmental and climate impacts and to continuously improve environmental protection. Partners will identify environmental risks and implement appropriate preventive measures. They will encourage environmentally conscious behaviour on the part of their customers.

#### a) Environmental pollution and resource saving

PHARMIX, s.r.o. requires its partners to conserve natural resources. It is necessary to minimize or avoid negative impacts on the climate, the environment and animals by reusing and recycling materials, adjusting production processes and using substitute materials. In addition, partners are expected to engage in the development and use of climate-friendly products and work practices to support the reduction of greenhouse gas emissions.

#### b) Hazardous materials

Biological or chemical materials or any other materials that could cause harm to humans, animals or the environment, either by themselves or by interaction with other materials, must be identified and handled safely. This applies to the storage, handling, use, recycling and disposal of these materials. All information relating to safety must be communicated to PHARMIX. Ltd.

#### (c) Waste water and solid waste

Partners must have systems in place to ensure the safe handling, transport, storage, reuse or recycling of wastewater and solid waste. They are expected to reduce or avoid waste of all kinds, including energy waste, for example by modifying production processes, maintenance, use of substitute materials, recycling or reuse. All activities that could have a negative impact on humans, animals or the environment must be carried out in an appropriate manner. Partners must monitor and evaluate all types of wastewater and solid waste generated from their operations before discharge or disposal and manage these substances accordingly.

# **Contractual partners of the partners**

Partners are encouraged to communicate the basic principles of this Code of Conduct to their immediate contractors, to promote compliance with the content of the Code among their contractors to the best of their ability, and to require their contractors to comply with the Code of Conduct. We further urge our partners to encourage their contractual partners to encourage their contractual partners to also comply with this Code of Conduct for Business Partners.

## **Publication data**

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