



CSL Third Party Code of Conduct

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CSL is a global biotechnology leader with business in more than 70 countries. We are committed to conducting all aspects of our business in an ethical and transparent way, and have a values-based culture that underpins our Purpose.

In order to fulfil our Purpose we rely on our entire supply chain across the globe to work together with CSL in accordance with the standards of governance, social, and environment, health and safety described in this Code. CSL is committed to engaging with third parties to support them in meeting the requirements laid out in this CSL Third Party Code of Conduct.

Our Purpose

The people and science of CSL save lives. We develop and deliver innovative medicines that help people with serious and life-threatening conditions live full lives and protect the health of communities around the world. Our Values guide us in creating sustainable value for our stakeholders.

Our Values

Patient Focus

We deliver on our promise to patients

Innovation

We turn innovative thinking into solutions

Integrity

We walk the talk

Collaboration

We are stronger together

Superior Performance

We take pride in our results

CSL is a member of the global Pharmaceutical Supply Chain Initiative (PSCI). The five key principles of the *PSCI Principles for Responsible Supply Chain Management 2019* are incorporated into CSL's Third Party Code of Conduct. These cover responsible business practices: ethics, human rights and labour, health and safety, environment, and related management systems. The PSCI Principles adopt the UN Guiding Principles on Business and Human Rights.

This document describes the obligations that apply to our third parties which are defined as any contractor, supplier, distributor or any other companies or individuals associated contractually with CSL in the development of, supply of, manufacturing of or delivery of CSL products. It requires that they act in accordance with our general principles of responsible business practice and provides standards against which third parties may be assessed during audits of compliance, or to identify areas for improvement.

The manner by which CSL delivers on these commitments is described in detail in CSL's Code of Responsible Business Practice available at CSL.com. It applies to our employees as well as all third parties.

Overarching requirements for our third parties are to:

- comply with the applicable local laws and regulations of the countries in which they operate;
- conduct their activities in a manner that ensures patients, customers, plasma donors, regulators and investors maintain confidence in our business;
- be transparent in the way in which they discharge their obligations to perform responsibly;
- have management systems in place to deliver upon their obligations reliably; and
- support, when applicable, CSL audits and/or provide audit evidence to verify the integrity of operations and supply.

CSL acknowledges that there may be challenges associated with interpreting and applying this code of conduct globally. While our ethical business principles per se are universal, the methods for meeting them may vary in accordance with influences such as the size and culture of the third party's business, and its location.

This CSL Third Party Code of Conduct does not supersede or alter the supplier's regulatory and contractual obligations.

1.1 Product quality

CSL relies on our entire supply chain across the globe to fulfil our commitment to deliver high-quality medicines to improve and save patients' lives and protect public health. Accordingly CSL's third parties must ensure they follow current good manufacturing practices (GMP), good laboratory practices (GLP) and good distribution practices (GDP) as well as the policies and procedures provided by our Quality Management System where they are applicable to them. CSL undertakes quality audits of the facilities, systems and/or documents related to the goods and services provided. Third parties are required to provide prompt responses and take corrective actions to remedy material observations cited.

1.2 Commitment and accountability

Third parties shall demonstrate commitment to the concepts described in this document by allocating appropriate resources and identifying senior personnel who are responsible.

1.3 Legal and customer requirements

Third parties shall identify and comply with applicable laws, regulations and customer requirements and with the same internationally recognised codes of practice/standards that CSL complies with.

1.4 Conflicts of interest

Third parties shall avoid conflicts of interest, real or perceived, that arise as a consequence of working with CSL.

Conflicts of interest can arise in situations in which a private interest (financial or otherwise) could conceivably influence an employee's judgment in handling transactions relating to CSL business. They can also occur when an employee's allegiance to a third party is reasonably regarded as competing with the interests and concerns of CSL.

Third parties shall ensure that adequate management systems are in place to prevent actual or potential conflicts of interest during transactions relating to the provision of goods or services to CSL. Third parties can utilise CSL's 'Speak Up' process to report any concerns related to any engagement with CSL (see section 1.9 Open reporting of concerns).

1.5 Risk management

Third parties have a responsibility to integrate risk management into all processes at every level, ensuring mechanisms are in place to identify and manage risks relating to the fulfilment of their contract with CSL. Third parties should have business continuity plans that outline how they will respond to relevant material risks in a timely manner. For applicable third parties, CSL may test continuity plans to ensure our ability to enable reliable supply to patients and public health.

CSL undertakes risk assessments of applicable third parties. Third parties are required to promptly provide responses and take corrective actions to remedy material observations/findings.

1.6 Documentation

Third parties shall maintain accurate and complete business records on all matters that are essential for the effective management of CSL's business including records to demonstrate conformance with this code of conduct and compliance with applicable regulations.

1.7 Training and competency

Third parties shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to address the expectations in this code of conduct.

1.8 Continual improvement

Third parties are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.

1.9 Open reporting of concerns

Third parties shall put in place a management system to facilitate 'speaking up' in an environment without fear of reprisal, retaliation or detriment. CSL's Speak Up Policy promotes proper use of procedures for third parties to report (anonymously where permitted) situations which may raise concerns under this code of conduct or relevant CSL policies, standards or Values. Third parties can access CSL's Speak Up hotline and reporting platform via CSL.com.

1.10 Communication

Third parties shall have effective systems in place to communicate the expectations in this code of conduct and/or equivalent codes of the third party for their workers and contractors.



2.1 Human rights and labour

All CSL's operations are governed by the United Nations Declaration of Human Rights and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the rights they set out. Third parties have a responsibility to respect the rights of all individuals with whom they interact, including patients, clinical trial participants, plasma donors, healthcare professionals, and their employees, treating them with dignity and respect. Where practical and of mutual benefit, CSL will partner with stakeholders including industry associations, and government and non-government organisations to continually improve the human rights practices of our third parties.

2.1.1 Freely chosen employment

Third parties shall not use solicitation, facilitation, or any other form of slavery or human trafficking. Under no circumstance should any engagement with the third party deprive individuals of their freedom.

2.1.2 Child labour and young workers

Third parties must recognise the right of every child to be protected from economic exploitation. They must observe the minimum age requirements of the country in which they operate.

2.1.3 Non-discrimination and harassment

Third parties shall provide an equal employment opportunity (EEO) workplace free from harassment and discrimination for reasons such as gender, age, ethnicity, religion, disability, sexual orientation, and any other criteria protected by applicable law or company policy. Harassment must not be tolerated in any form, including bullying and occupational violence in any workplace context.

2.1.4 Wages, benefits and working hours

Third parties must comply with workplace laws in the geographies and working environments in which they operate. Employees should receive payment which meets or exceeds the minimum wage for their work and all employment benefits that they are legally entitled to receive. Their terms and conditions of employment will meet or exceed minimum legal standards.

2.1.5 Freedom of association or representation

Third parties must ensure that the rights of workers to associate freely and seek representation as provided for in local legislation are upheld.

2.2 Ethics

Third parties shall conduct all aspects of their businesses in an ethical and transparent way, complying with all applicable local laws, regulations, guidelines and pharmaceutical industry standards and codes of conduct in the countries where they operate.

2.2.1 Anti-bribery and corruption

Third parties must not directly or indirectly offer, pay, solicit or accept bribes or give or receive personal favours, financial or other rewards or inducements in exchange for providing or receiving favourable treatment. Facilitation payments are also prohibited.

This provision includes a prohibition on the offer of inducements such as gifts or entertainment to CSL employees or contractors, other than in accordance with the provisions of the CSL Code of Responsible Business Practice.

2.2.2 Fair competition

Third parties shall support the principles of fair competition in their business dealings. This includes compliance with applicable competition law and forbidding unfair practices that would mislead consumers; restrict access to therapies; result in pricing that is in contravention of applicable law; result in coordination of market behaviour with competitors; gather competitive intelligence other than in a manner that is ethical, transparent, and in compliance with all laws and regulations; or constitute other unfair practices.

2.2.3 Interactions with healthcare professionals (HCPs) and healthcare organisations (HCOs)

The way in which pharmaceutical companies and appointed third parties interact with HCPs and/or HCOs is an important issue for the industry. Such interactions must not constitute an inducement to recommend, prescribe, purchase, supply, sell or administer specific medicinal products.

Interactions in the pharmaceutical industry takes many forms and may include, among others:

- sponsoring conferences and medical seminars;
- sponsoring HCPs to speak at conferences and medical seminars; and
- hospitality for HCPs to attend conferences or medical meetings.

CSL and appointed third parties, must consider each interaction carefully, with an emphasis on ensuring that such interactions are in the course of a bona fide business relationship, and that CSL products and services are represented truthfully, fairly and accurately and in full compliance with all applicable laws and industry codes of conduct. Furthermore, any transfer of value undertaken by a third party on behalf of CSL must be made in accordance with CSL policies and procedures.

Third parties must have policies and compliance training programs in place to ensure that relevant employees understand their own and CSL's obligations in relation to interactions with HCPs and/or HCOs. Failing to comply with CSL policies in this regard is considered to be serious misconduct, which may lead to disciplinary action up to and including termination.

2.2.4 Animal welfare

Third parties shall comply with relevant local laws and international codes of practice. Animals shall be treated humanely and any pain and stress minimised. Animal testing should only be used where there are no scientifically valid alternatives that are acceptable to regulators. Where they are used, efforts should be made to reduce the numbers of animals tested to the minimum necessary.

2.2.5 Data privacy and security

Third parties shall safeguard confidential CSL information and only use it for its intended purpose. Third parties shall provide reasonable protection for achieving the following goals: data confidentiality; data integrity; data availability; accountability of individuals who access or manage CSL data; auditability of systems that process or store CSL data; protection of the privacy rights of company, worker, patient, healthcare professionals and plasma donors; and data security and lawful use of personal data. This includes ensuring that information collected is used exclusively for the purpose for which it was received.

2.2.6 Patient safety and access to information

Third parties shall ensure that adequate management systems are in place to minimise the risk of adversely impacting on the rights of patients, clinical trial participants and donors, including their rights to health and direct access to information. They should endeavour to share study results with patients who participate in CSL-related clinical studies by publishing plain-language summaries for study participants.

2.2.7 Clinical trials

Third parties conducting clinical trials on behalf of CSL shall conduct all trials responsibly giving healthy volunteers and patients the utmost respect and concern for their wellbeing, and protecting their human rights. Potential trial participants must be given transparent and understandable information on the aims of a study, the risks and the potential benefits. The collection of sensitive information shall be limited to the collection of information that is necessary to carry out the business purpose. All clinical trials with which CSL is associated must meet recognised international data quality and ethical standards, including compliance with good clinical practice (GCP) guidelines.

2.2.8 Trade compliance

Third parties shall comply fully with the trade restrictions in United Nations resolutions and national trade sanction laws, especially of the United States (US), the European Union and Switzerland. These include but are not limited to trade sanctions enforced by the US government, which restrict US companies and/or their subsidiaries anywhere in the world, including third parties, to enter into transactions with embargoed or sanctioned countries.

Third parties shall provide safe and healthy workplaces and conduct all their operations in a way that minimises their impact on the environment and conserves natural resources.

3.1 Worker protection

Third parties shall protect the health and safety of their employees and other persons present on their premises.

Appropriate training, resources and supervision should be provided so that employees and other persons on the premises are aware of their environmental responsibilities contained in this code of conduct and are equipped with the necessary skills and training to meet them.

A health and safety management system shall be implemented, maintained and continuously improved.

3.2 Emergency preparedness and response

Third parties shall ensure that employees and other persons on their premises report all incidents and hazards as soon as possible, so that appropriate action can be taken to prevent, correct or control these conditions.

3.3 Environmental compliance and reporting

Third parties shall operate within the environmental laws and regulations of the jurisdictions in which they operate, meeting or exceeding applicable environmental standards, and taking effective action to address any instances of non-compliance should they occur.

3.4 Waste and emissions

Third parties shall strive to reduce emissions and reduce pollution, using a hierarchy of approaches for prevention of pollution, including minimising the amount of wastewater, air emissions and solid waste produced, to prevent damage to human health and the environment.

3.5 Spills of hazardous materials

Third parties shall ensure that all spills of chemicals or any other hazardous materials are promptly reported to the nominated officer within their organisation to enable early investigation and any further necessary action to be taken.

3.6 Sustainable resource use

Environmental stewardship should be integrated into the business processes, risk assessment, planning and decision-making of third parties. They shall maximise the efficiency of use of water, energy and other resources including through continuous improvement of their manufacturing operations.

Third parties should seek to engage and collaborate with their stakeholders, openly communicating accurate information about their environmental performance and relevant environmental issues, including through public corporate reporting.

3.7 Climate change

CSL encourages third parties to track their Scope 1 and Scope 2, and where possible Scope 3 emissions. They should make disclosures consistent with internationally accepted carbon accounting standards and take action to minimise emissions and manage material climate change risks on operations.

Bribery:

Offering something of personal value to a decision-maker, in order to receive favourable treatment, typically to secure or retain business, or to obtain an improper advantage. Bribery can take the form of monetary instruments, such as cash, or can be anything of value (e.g. travel, services, discounts, gifts).

Business records:

Information created, received or maintained by or on behalf of CSL, including by its employees, contractors and agents, for the purpose of or relating to the transaction of CSL's business, or in the course and scope of complying with CSL's legal and/or regulatory obligations. Records include all forms of communication, correspondence, data, agreements, documents, presentations, files, books and logs, regardless of physical form, characteristics or location, including specifically paper, electronic, audio and all other media.

Conflict of interests:

Conflicts of interest can arise in situations in which a private interest (financial or otherwise) could conceivably influence an employee's judgment in handling transactions relating to CSL business. They can also occur when an employee's allegiance to a third party is reasonably regarded as competing with the interests and concerns of CSL.

Confidential and restricted confidential information:

Any proprietary information (information generated by or for CSL, or information disclosed to CSL by a third party under an obligation of confidence), the unauthorised disclosure of which could cause damage to the interests of its owner, be that CSL or a third party.

Entertainment:

Includes hospitality (e.g. meals), receptions, tickets to entertainment, social or sports events, participation in sporting events, lodging and travel.

Equal employment opportunity (EEO):

The right of persons to be given full and equal consideration on the basis of merit or other relevant, meaningful criteria regardless of race, colour, gender, religion, personal association, national origin, age, disability, marital status, sexual orientation or family responsibilities or other criteria protected by applicable law.

Facilitation payment:

A small payment made to a government official to secure or expedite the performance of a routine or necessary action (e.g. the issue of a permit or licence).

Freedom of association or representation:

A right identified under international labour standards as the right of workers to organise and have representation.

Gifts:

Anything of value, including cash or cash equivalents, goods or services, given to another person without (full) consideration in return.

Third parties:

Any contractor, supplier, distributor or any other companies or individuals associated contractually with CSL in the development of, supply of, manufacture of or delivery of CSL products.