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# INTRODUCTION

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.

To fulfill our Strategic Ambition, we rely on our global supply chain to adhere to the governance, social, and environmental standards outlined in this Third-Party Code of Conduct ('TPCC'). We are committed to supporting our third party partners to deliver performance in accordance with this TPCC.

### **Our Strategic Ambition**

To deliver enduring patient impact in areas of high unmet medical need.

#### **Our Values**



#### **Patient Focus**

We deliver on our promise to patients by developing therapies that address their unique challenges and improve their overall quality of life. As a global biotechnology company, our commitment to our patients is unwavering. We listen closely to understand their needs and strive to provide meaningful benefits through our innovative treatments.



#### Innovation

Innovation is central to CSL's mission. We invest heavily in advanced technologies to develop new and better products, supporting a continuous pipeline of safe, effective, and life-saving medicines. Our dedication to research and development drives us to explore novel therapeutics and improve existing ones, keeping us at the forefront of medical advancements.



#### Integrity

We always strive to do the right thing for our patients, communities, shareholders, and employees. Acting honestly and transparently is fundamental to our operations, and we adhere to high ethical standards. We build trust by holding ourselves accountable and embracing sustainable practices that respect our planet and its people.



#### Collaboration

We value diverse perspectives and foster an inclusive environment where all voices are heard. Partnering with the broader medical community, we invest in education, clinical research, and scientific exchange to improve lives. Our collective strength is maximised when we work together, challenge assumptions, and unite as a cohesive team.



#### **Superior Performance**

We aim for excellence in everything we do, whether in products, finance, operations, or the workplace. We recognise and reward outstanding performance, encouraging our employees to invest in their well-being and strive for continuous improvement. By fostering a culture of excellence and growth, we achieve superior results as individuals and as a team.

As a member of the Pharmaceutical Supply Chain Initiative (PSCI), CSL incorporates PSCI's Principles for Responsible Supply Chain Management 2023 in this TPCC. The five key principles include ethics, human rights, health and safety, environment, governance and management systems. The PSCI Principles adopt the UN Guiding Principles on Business and Human Rights.

This TPCC applies to all our partners, including contractors, suppliers, distributors or other companies or individuals associated contractually with CSL. We expect our partners to align with CSL's Values and principles set out in this document.

Overarching requirements for our partners are to:

- comply with all applicable local laws and regulations of countries of operation;
- conduct activities in a manner that maintains confidence among all of our stakeholders, including but not limited to patients, customers, plasma donors, regulators, investors and the public;
- 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.

Refer to CSL's Code of Conduct at CSL.com for details on how we deliver our commitments to high ethical standards.

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



#### 1.1 Product Quality

At CSL, we are committed to delivering highquality medicines that improve, protect, and save lives through strong partnerships across our global supply chain. Together, we aim to maintain the highest standards by aligning with current Good Manufacturing Practices (GMP), Good Laboratory Practices (GLP), and Good Distribution Practices (GDP).

To support this, CSL conducts audits of relevant facilities, systems, and documentation, and we appreciate our partners' cooperation in responding to findings and implementing timely corrective actions where needed.

#### 1.2 Commitment and Accountability

We encourage our partners to work alongside us in upholding the principles of this TPCC by dedicating appropriate resources and engaging senior personnel to help guide and champion these efforts.

#### 1.3 Legal and Customer Requirements

To support our shared commitment to ethical performance, we work closely with our partners to align with applicable laws, regulations, customer requirements, and internationally recognised standards of practice.

#### 1.4 Conflicts of Interest

We value working together in a spirit of trust and transparency. We ask our third-party partners to ioin us in avoiding any real or perceived conflicts of interest. These can arise when:

a CSL employee's connection or loyalty to a third party could reasonably be viewed as competing with CSL's interests and priorities; or a private interest—financial or otherwise might influence the judgment of a CSL employee or a third-party worker in matters involvina CSL.

By putting effective management systems in place, we can work together to identify and prevent actual or potential conflicts during our business interactions. If at any point our partners have concerns related to your engagement with CSL, we encourage you to raise them through CSL's 'Speak Up' process (see section 1.12, Open Reporting of Concerns).

#### 1.5 Risk Management

At CSL, we believe that managing risks effectively is a shared responsibility. We ask our partners to embed risk management into all processes, ensuring there are mechanisms to identify and address any risks that could affect the fulfilment of their contract with CSL. We also encourage partners to maintain robust business continuity plans so that material risks can be addressed promptly. For certain partners, CSL may work with you to test these plans, helping ensure a reliable supply to patients and supporting public health.

We also ask that partners have systems in place to conduct due diligence within their own supply chains, including the ability to trace raw material sources to ensure they are legally and sustainably sourced.

In some cases, CSL may conduct risk assessments of applicable partners. If any material observations or findings arise, we appreciate your prompt response and collaboration in taking corrective action.



### GOVERNANCE

#### 1.6 Documentation

At CSL, we see accurate record-keeping as an important part of building trust and working effectively together. We ask our partners to maintain clear, complete, and accurate business records on all matters essential to supporting CSL's work. This includes keeping documentation that shows alignment with this TPCC and compliance with applicable regulations.

#### 1.7 Training and Competency

We believe that knowledge and skills are key to meeting the expectations in this TPCC. We encourage our partners to have training programs that help both managers and workers build the understanding, abilities, and confidence needed to put these expectations into practice.

#### 1.8 Continual Improvement

At CSL, we believe in improving together. We encourage our partners to set goals, act on plans, and address any issues identified through assessments or reviews—so we can keep raising standards and achieving better results together.

### 1.9 Communication

We ask our partners to have effective ways of communicating this TPCC—or an equivalent code—to their workers, contractors, and suppliers, so everyone understands and upholds our shared standards.

#### 1.10 Compliance with this TPCC

If any part of this TPCC is not followed, we ask our partners for timely corrections as guided by CSL. After a warning and a reasonable chance to fix issues, CSL may temporarily pause the agreement if obligations are not met. If problems persist and are serious, CSL may end the agreement for good cause (with immediate effect or with an expiration period) provided that the violation is assessed as

material.

#### 1.11 Right to Audit

CSL may verify compliance with this TPCC using a risk-based approach, including audits through questionnaires or on-site visits. Together, we will ensure everything meets the standards smoothly and confidently.

#### 1.12 Open Reporting of Concerns

We encourage our partners to create a safe space where everyone feels comfortable speaking up without fear of reprisal or retaliation. Partners should maintain a clear complaints mechanism and ensure their workers and suppliers know how to access it.

CSL's Speak Up Policy encourages partners to report any concerns under this TPCC or CSL's policies, standards, or Values—anonymously where allowed. The Speak Up hotline and reporting platform are easy to access via the QR





#### 2.1 Human Rights and Labour

CSL's operations follow the United Nations Declaration of Human Rights and the Organisation for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises. We ask our partners to respect the rights and dignity of everyone they engage with patients, trial participants, donors, healthcare professionals, and employees, treating them with dignity and respect, and to address human rights throughout their supply chains.

Where practical and mutually beneficial, CSL will work together with industry groups, governments, and non-government organisations, to improve human rights practices across our third-party network. By partnering, we can create meaningful, positive impact.

#### 2.1.1 Freely Chosen Employment

We ask our partners to join us in ensuring that no solicitation, facilitation or any other form of slavery, human trafficking, or forced labour occurs.

Together, we are committed to protecting everyone's freedom and dignity in all our engagements.

#### 2.1.2 Child Labour and Young Workers

We ask our partners to help us protect every child's right to be free from economic exploitation. This means no child labour and respecting the minimum age laws or requirements wherever they operate.

#### 2.1.3 Local Communities

We ask our suppliers to ensure that the rights of local communities are respected, including their fundamental right to a clean and healthy environment, in all areas where we operate.

#### 2.1.4 Non-discrimination and Harassment

We ask our partners to create an inclusive workplace where everyone has equal opportunities, free from harassment or discrimination based on gender, age, ethnicity, religion, disability, sexual orientation, or any other protected characteristic.

Together, we are committed to fostering a safe environment where bullying and workplace violence are never tolerated.

### 2.1.5 Wages, Benefits and Working Hours

We ask our partners to respect workplace laws wherever they operate, ensuring employees receive at least the minimum wage and all required benefits. By meeting or exceeding these standards, we can work together to provide fair compensation and treatment for everyone.

#### 2.1.6 Freedom of Association or Representation

We encourage our partners to respect workers' rights to freely associate and seek representation, following local laws. It is important that employees feel safe to share their thoughts about working conditions openly—without fear of retaliation, intimidation, or harassment.

## **HEALTHIER COMMUNITIES**

#### 2.2 Ethics

We ask our partners to run their businesses ethically and transparently, following all local laws, regulations, and industry standards wherever they operate. Together, we can uphold the highest standards of integrity.

#### 2.2.1 Anti-bribery and Anti-Corruption

At CSL, we ask our partners to join us in maintaining the highest standards of integrity by never offering, paying, soliciting, or accepting bribes or personal favours. This includes avoiding any financial or other rewards in exchange for favourable treatment, as well as prohibiting facilitation payments. We also ask our partners to refrain from offering gifts or entertainment to CSL employees as inducements. Together, we can build a culture of trust and fairness.

#### 2.2.2 Fair Competition

At CSL, we are committed to respecting and promoting fair competition by complying with all applicable antitrust and fair competition laws. We ask our partners to join us in this commitment by avoiding practices that may mislead consumers, restrict access to therapies, violate pricing regulations, unethically coordinate market behavior, or engage in unlawful competitive intelligence. By working together, we can foster a fair, transparent, and trustworthy marketplace for all

### 2.2.3 Interactions with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs)

At CSL, we ask our partners to engage responsibly with healthcare professionals (HCPs) and healthcare organisations (HCOs), ensuring interactions do not unduly influence the recommendation, prescription, supply, sale, or administration of any medicinal products. These interactions can include sponsoring conferences and medical seminars, supporting HCPs as speakers, and providing hospitality for attendance at conferences or medical meetings.

All such engagements should reflect legitimate business relationships, with CSL's products and services represented fairly and truthfully, in full compliance with applicable laws and industry

codes. Where required, any transfer of value made on CSL's behalf must be transparently disclosed according to regulations.

We ask our partners to have clear policies and training, so their teams fully understand these obligations. By working together with integrity, we uphold trust and compliance. Non-compliance is taken seriously and may lead to dismissal of partners' workers or termination of contracts.

### 2.2.4 Animal Welfare

We ask out partners to respect all relevant local laws and international codes regarding animal welfare and testing. Animal testing should occur only when no scientifically valid alternatives are accepted by regulators. We ask our partners to ensure humane and ethical animal use, using animals in research only when no other practical scientific or regulatory alternatives exist.

#### 2.2.5 Data Ethics, Privacy and Security

At CSL, we ask our partners to uphold the highest ethical standards in managing personal data collected from patients, plasma donors, healthcare professionals, clinical trial participants, CSL employees, and others who trust us with their information. We ask our partners to protect this data carefully, using it only for its intended purpose, and to ensure its confidentiality, integrity, and availability at all times.

We rely on our partners to designate accountable individuals for data access and management and to maintain secure, auditable systems. Protecting the privacy rights of our company, workers, patients, healthcare professionals, and plasma donors is a shared responsibility. In case of a data breach, timely disclosure in accordance with applicable laws and regulations is essential.

Together, we build trust through responsible and respectful data management.

### HEALTHIER COMMUNITIES

#### 2.2.6 Patient Safety and Access to Information

At CSL, we ask our partners to have strong management systems in place to protect the rights of patients, clinical trial participants, and donors—especially their rights to health and access to information. We encourage our partners to share study results with participants by providing clear, plain-language summaries, helping keep them informed and engaged.

Together, we can support transparency and respect for everyone involved in CSL-related clinical studies.

#### 2.2.7 Clinical Trials

We ask our partners conducting clinical trials on our behalf to prioritise the respect, wellbeing, and human rights of all volunteers and patients. Participants should receive clear, understandable information about the study's purpose, risks, and potential benefits, and provide informed consent to confirm their understanding.

Sensitive information collection should be limited strictly to what is necessary. All CSL-related clinical trials must follow recognised international ethical and data quality standards, including Good Clinical Practice (GCP) guidelines. Together, we commit to conducting trials responsibly and with the utmost care for those involved.

### 2.2.8 Trade Compliance

At CSL, we are committed to respecting all import, export, sanctions, and trade laws in every jurisdiction where we operate. We ask our partners to do the same, including adherence to United Nations resolutions and national laws in regions including but not limited to, the United States (US), European Union (EU), Australia, the United Kingdom (UK), and Switzerland.

We encourage our partners to be mindful that these laws may restrict transactions with denied individuals, entities, or companies they control, as well as with embargoed or sanctioned countries.

Together, by respecting these rules, we promote responsible and lawful trade.

#### 2.2.9 Social Media

At CSL, we encourage our partners to use social media responsibly, professionally, and ethically to help protect our shared integrity and reputation. We ask that all online activities remain respectful and avoid sharing CSL's trade secrets or confidential information.

Partners should never make statements on behalf of CSL and must clearly state that their personal views do not represent the company. We ask our partners to follow: CSL Social Media Community Guidelines.

Together, we can maintain trust through thoughtful and careful communication.

### 2.2.10 Artificial Intelligence

We ask our partners to use Artificial Intelligence (AI) responsibly and ethically, reflecting our shared commitment to fairness, transparency, security, and compliance with all relevant laws. Al should be developed and applied with respect for individual rights, prioritising cybersecurity, data protection, and privacy.

We encourage our partners to carefully monitor Al-generated outcomes to ensure accuracy and alignment with CSL's Strategic Ambition and Values, and to document AI development clearly to demonstrate accountability.

Together, we can harness Al's potential responsibly and thoughtfully.

At CSL, we encourage our partners to provide safe, healthy workplaces and minimise their environmental impact. Together, we can build a safer, more sustainable future.

#### 3.1 Worker Protection

We work together with our partners to prioritise workplace health and safety. We ask our partners to identify and comply with all relevant laws and regulations, and to implement health and safety management systems aligned with recognised standards like ISO 45001. By fostering clear understanding and commitment to health and safety policies among all workers, we can create safer workplaces for everyone.

#### 3.2 Emergency Preparedness and Response

We encourage our partners to foster a culture where employees and everyone on their premises promptly report any incidents or hazards. We also support having strong emergency plans and training in place to ensure timely and effective action can be taken to prevent or manage any incidents or emergencies. Together, we can keep our workplaces safe and prepared.

#### 3.3 Environmental Compliance and Reporting

We encourage our partners to operate in compliance with environmental laws and regulations, meeting or exceeding all applicable standards. It's important that our partners provide the training, resources, and support needed so everyone understands and fulfils the environmental responsibilities outlined in this TPCC. When issues arise, we expect timely and effective action to address them. Together, we can protect our environment.

#### 3.4 Waste and Emissions

We encourage our partners to actively monitor and reduce their greenhouse gas emissions, while also supporting their suppliers to do the same. Partners should have clear processes in place to lower emissions and pollution, protecting both human health and the environment. These efforts should focus on minimising wastewater, air emissions, and solid waste—through prevention, reuse, and recycling wherever possible.

#### 3.5 Spills of Hazardous Materials

We ask our partners to promptly report any chemical or hazardous material spills to their organisation's designated officer to ensure quick investigation, response, and mitigation. Together, we can protect people and the environment.

#### 3.6 Resource Efficiency

We encourage our partners to integrate environmental stewardship into their business processes, risk assessments, planning, and decisionmaking. Partners should strive to maximise resource efficiency—like water, energy, and circularity—by continuously improving manufacturing operations.

We value open collaboration with stakeholders, encouraging partners to share accurate information about their environmental performance, including through public reporting. Together, we can drive positive environmental change

#### 3.7 Conflict Minerals

We ask our partners to identify, reduce, and where possible eliminate the use of certain minerals known as 'conflict minerals' or '3TG'—such as tin, tungsten, tantalum, and gold—in products, components, and materials supplied to CSL that have been determined to have directly or indirectly financed or benefited armed groups in the Democratic Republic of Congo (DRC) or its adjoining countries.

#### 3.8 Climate Change

We encourage our partners to track their Scope 1 and Scope 2 emissions, and where possible, Scope 3 emissions as well. We support transparent disclosures aligned with internationally accepted accounting standards and encourage taking action to minimise emissions and manage significant climate change risks within their operations. Together, we can work towards a more sustainable future.

