

# California Transparency in Supply Chains Act

Siegfried Holding AG and its affiliated companies (hereinafter "Siegfried") support the goals of the California Transparency in Supply Chains Act of 2010 and strive to be examples of good human rights and labor practices in the field of pharmaceutical contract manufacturing. Siegfried's ethic principles and our understanding of GMP allow no compromise with respect to human rights and especially slavery and human trafficking. Since our foundation in 1873, we have built our business on the conviction that to have long-term success, we not only have to comply with all applicable legal requirements and ensure and consider the sustainability aspect of activities that Siegfried engages with in the realm of human rights, but additionally we have to create significant value for our customers and society.

Siegfried's actions to incorporate our ethics standards in our supply chain management system include the following:

## 1. Product Supply Chains / Suppliers

In accordance with our guiding principles for Good Manufacturing Practice we select, qualify and develop our suppliers based on our Standard Operating Procedures (SOP) for managing the supply chain. No compromise with non-compliance is one of our principles. With respect to humanity, all kind of slavery, child labor and human trafficking is regarded as non-tolerable.

## 2. Supplier Audits

Siegfried reserves the right to verify our supplier's compliance with the Siegfried supply standards. Siegfried confirms compliance with the defined standards through audits conducted by experienced and trained auditors.

In the event that Siegfried becomes aware of any actions or conditions not in compliance with Siegfried supply chain standards, we reserve the right to demand corrective measures. Furthermore Siegfried reserves the right to terminate an agreement with any supplier who does not comply with the Siegfried supply chain standard.

At our audits topics like child labor, human trafficking, health and safety aspects are checked and evaluated.

## 3. Human Rights in our business activities

Siegfried's guiding principles for management and leadership fully support the United Nations Global Compact's (UNGC) guiding principles on human rights and labor, and aim to provide an example of good human rights' and labor practices throughout our business activities.

## 4. Code of Business Conduct

Since Siegfried was founded, its business practices have been governed by integrity, honesty, fair dealing and full compliance with all applicable laws. Siegfried employees worldwide have upheld and lived this commitment in their every-day-responsibilities ever since, and Siegfried's reputation remains one of the company's most important assets today.

Siegfried guiding principles prescribe certain values and principles which Siegfried has committed to worldwide. This code of business conduct specifies and helps the continued implementation of the Siegfried supply chain standards by establishing certain nonnegotiable minimum standards of organizational and individual behavior in key areas.

## 5. Employee Training

Our Supply chain standards are incorporated in a set of Standard Operating Procedures (SOP) for key processes which ensure quality standards (GxP) and Siegfried guiding principles at the same time. All Siegfried employees are trained and qualified to apply all SOP relevant for their individual organizational responsibility.

As constitutional part of our SOP for audits every supplier is assessed for compliance with Siegfried Labor Standards amongst which banishment of slavery, child labor and human trafficking will be checked.

The Siegfried guiding principles will continue to evolve and adapt to a changing world. Our basic foundation is unchanged from the time of the origins of the company, and reflects the basic ideas of fairness, honesty, and a general concern for people.

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### Contact

Siegfried Holding AG  
Untere Brühlstrasse 4  
4800 Zofingen

Switzerland  
integrity@siegfried.ch  
www.siegfried.ch