



# Sobi Partner Code of Conduct

Global policy for Swedish Orphan Biovitrum Group

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## Introduction

To reach Sobi's vision of transforming the everyday lives of people living with rare or serious diseases, Sobi will act responsibly and build trust in every aspect of our business. The safety and integrity of the patients we serve, our customers and our employees are vital and the quality of the products we provide is of the highest priority. Enabling access to safe and effective treatments is our key contribution to sustainable development.

In our daily business and throughout our operations, we comply with ethical guidelines such as the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and we conduct our business in a manner consistent with the United Nations Guiding Principles on Business and Human Rights. Sobi is since 2017 a signatory to the United Nations Global Compact and its ten principles.

We strive to build long-term and stable relationships with our partners and suppliers. We promote responsible business practices and are committed to working only with partners who embrace standards of ethical behaviour that are consistent with ours.

This document summarises what we believe is required to do the right thing, and what all third parties who work with us, for us, or on our behalf should follow. In addition to the basic requirements to follow the law and act with integrity, our Partner Code of Conduct is part of our fundamental commitment to responsible sourcing.

No guidelines, no matter how detailed, can anticipate all possible scenarios and challenges. We therefore expect all Partners to always use judgement and common sense, and act in accordance with both the spirit and the letter of this Partner Code of Conduct, and relevant laws and regulations.

### **Guido Oelkers**

CEO and President

Stockholm, Sweden

June 2026

**“We strive to build long-term and stable relationships with our Partners. We promote responsible business and are committed to work only with Partners who embrace standards of ethical behaviour consistent with our own. ”**

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For CDMOs, transporters and logistics companies, the entire document is valid. Partners that provide Sobi with other services or supply indirect materials can disregard sections marked in blue.

## Purpose

The purpose of Sobi's Partner Code of Conduct (the 'Code') is to clarify the minimum standards to which we expect our Partners to live up. Compliance with this Partner Code of Conduct, or with an agreed equivalent standard, is a qualifying basis for establishing and maintaining a business relationship with Sobi.

Partners are defined as suppliers, contractors, distributors, joint-venture or co-promotion partners, agents, and research or licensing partners.

We will work in dialogue and partnership with our Partners to ensure they accept, support and follow these principles.

Prior to entering into a contract, Sobi will assess new Partners' application of these principles in accordance with Sobi's risk assessment and third-party due diligence processes. Reassessments of existing Partners may take place to ensure that the standards are being met.

Sobi is a member of the Pharmaceutical Supply Chain Initiative (PSCI). The Sobi Partner Code of Conduct is also consistent with the PSCI Principles for Responsible Supply Chain Management covering ethics, human rights, health and safety, environment and governance and management systems and demonstrates our commitment to contributing to the PSCI ambitions to make global supply chains more sustainable.

## Commitments

### Compliance and responsible business conduct

Sobi firmly believes that society and business are best served by responsible business practices. Responsible business conduct requires not only compliance with applicable laws and regulations, but also adherence to ethical standards that address broader societal, environmental, and governance concerns. Partners are expected to integrate responsible business principles into their operations and decision-making processes.

We expect our Partners to be up to date on and comply with all applicable laws and regulations applicable to their operations and activities performed in connection with Sobi. Where applicable laws differ across jurisdictions, Partners shall comply with the more stringent requirement whilst upholding the principles of this Code. Frameworks of specific importance are explicitly mentioned in the sections below.

Sobi expects its Partners active in the pharmaceutical sector to comply with quality and safety standards as applicable to their operations, such as GCP, GMP, GDP and GLP.

In addition to compliance with laws and regulations, we expect Partners to comply with the principles and requirements set out in this Code. In the event of any conflict between this Code and the terms of the underlying agreement, the underlying agreement shall prevail unless the Code imposes a higher standard of conduct, in which case the Code shall apply.

The Partner is responsible for compliance with the Code for its supply chain activities as well as applicable sub-contractors engaged by a Partner in connection with activities performed for or on behalf of Sobi.

If a Partner does not meet the requirements of this Code, Sobi is committed to engaging constructively to support remediation efforts. The parties shall agree on and implement appropriate corrective actions within a reasonable timeframe. Serious or repeated violations of this Code, or a failure to implement agreed corrective actions, may result in Sobi exercising its rights under the underlying agreement, which may include suspension or termination of the contractual relationship.

The parties shall maintain an open and trust-based relationship in which potential compliance concerns can be raised without fear of retaliation. Partners shall promptly notify Sobi of any actual or suspected non-compliance with this Code or applicable laws and shall cooperate in good faith to investigate and resolve such matters. Partners and their personnel may also report concerns confidentially and anonymously via Sobi's Compliance Hotline. Information about and access to this hotline is available at sobi.com.

## Human and labour rights

Human rights are a foundation for our operations. Partners shall respect human rights and promote them in their own organisations and any third-party relationships as outlined in the International Bill of Human Rights and in the International Labour Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work.

The Partner shall support and respect the protection of internationally adopted human and labour rights including:

- **Child labour:** No child labour in any form may be tolerated. No person younger than 15 or the statutory minimum age for employment according to the UN Convention on the Rights of the Child or national regulation, whichever states the strictest provision, shall be employed. People under the age of 18 can never be used for hazardous work, night work or work that conflicts with their compulsory education.
- **Forced labour:** No forced, compulsory or involuntary labour shall be tolerated in any form. This includes any work or services extracted from someone under the menace of any penalty, or for which a person has not offered their services voluntarily. Partners must have safeguards in place to ascertain avoidance of any link to human trafficking or modern slavery in operations or supply chain.
- **Respect for diversity, with no discrimination, harassment or abuse:** We do not tolerate any physical or mental harassment or abuse. Nor do we tolerate discrimination in hiring and employment practices such as promotion, benefits and access to training and personal development. Partners are required to respect diversity and the personal dignity of their workforce.
- **Freedom of association and right to collective bargaining:** Partners shall ensure that freedom of association is safeguarded through the right to join, not join, or form a labour union in accordance with the law is respected without fear of reprisal, intimidation, or harassment and recognise employees' right to collective bargaining.

- **Compensation:** Partners shall comply, at a minimum, with local laws and regulations relating to wages, including minimum wages, overtime hours and mandated benefits.
- **Working hours:** Partners are required to ensure that working hours comply with local laws, ILO conventions or collective agreement, whichever affords the greater protection of the worker. Partners are further required to ensure that working hours are divided, if required by local laws, into normal working hours and overtime hours and shall not exceed the maximum set by local laws. Overtime shall be voluntary.
- **Issue reporting:** Partners shall provide workers with a mechanism to report incidents/complaints/violations of policies that is transparent, unbiased and anonymous without risk for retaliation against workers who report. Reports should be investigated, and substantiated violations remediated in an appropriate way.

## Employee health and safety

Partners shall identify and assess health and safety risks and minimise negative impacts. The partner is responsible for protecting employees from health and safety hazards and supplying proper personal protective equipment. Partners should also manage, track, and report workplace injuries and illnesses with clear procedures, and ensure that appropriate mitigation actions are implemented and are effective.

Partners should promote a safety culture by establishing effective policies, systems, and training. All incidents and near misses must be reported, investigated, and addressed with corrective actions.

Partners must assess possible emergency situations at workplaces and potential accommodations, create response plans, conduct regular drills, and train all workers to act quickly and effectively in emergencies.

### Specific requirements for CDMOs, transporters and logistics companies

Partners shall ensure a safe workplace, protecting workers from chemical, biological, physical, and environmental hazards, and by providing medical evaluations, exposure monitoring, and adequate personal protective equipment.

#### Process safety

Partners must analyze hazards, control chemical and biological risks, and manage programs to prevent hazardous releases like fires and explosions. Routine maintenance, inspections, and audits help ensure process safety and lower risks.

#### Hazard information & communication

Applicable safety information and instructions for management of hazardous materials should be available in languages workers understand. Occupational safety assessments should be available at start of production and kept up to date.

Partners must share hazard information throughout the value chain to control risks.

## Environment

Protection of our environment is a precondition for sustainable development. At Sobi, we strive to minimize negative impact on our environment and improve our environmental performance as well as the performance of others within our sphere of influence.

Partners must assess and proactively address environmental risks and manage the environmental impact of their operations, adopting a precautionary approach. Materials and methods that might pose potential risks should be replaced when suitable alternatives are available. Partners should aim for continuous improvement in environmental performance throughout their activities and supply chains and promote the development and distribution of more sustainable technologies.

## Resource efficiency and waste management

Partners should prioritise circular practices by minimizing resource use, implementing reuse, reducing waste and increasing efficiency. They must establish safe systems for handling, storing, transporting, recycling, and managing waste.

## Environmental footprint

The Partner is expected to minimize its environmental and energy footprint by reducing impacts and emissions across operations and the supply chain as well as increasing use of renewable sources of energy.

Sobi expects its Partners to set climate targets in line with the Paris Agreement.

Partners should aim to eliminate unnecessary single-use materials and where possible switch to renewable alternatives.

Partners shall work actively to identify risks for and prevent negative impact on biodiversity and prevent deforestation.

## Restricted substances

Sobi's expects Partners to continuously assess the impact of substances used in operations and work actively to exclude or limit the use of hazardous substances and implement more sustainable alternatives.

Partners shall also exercise due diligence to ensure that tin, tantalum, tungsten, gold and other minerals in their supply chain are not sourced from conflict-affected or high-risk areas in a manner that contributes to human rights abuses or armed conflict.

Partners must respond to requests for information regarding use of substances and product content.

## Specific requirements for CDMOs, transporters and logistics companies

### Environmental authorisations and reporting

The Partner must secure necessary permits and fulfil statutory reporting requirements,

### Resource efficiency and waste management

Partners must have effective systems to safely manage negative impacts from operations. Any potentially harmful waste, wastewater, or emissions, including active pharmaceutical ingredients must be properly treated before release. Partners must prevent and mitigate spills and releases to protect the community and environment.

### Environmental footprint

Partners should notify Sobi of material improvement opportunities and these should be explored in collaboration between Sobi and Partner.

If requested, the Partner should be ready to provide product-specific information to support life cycle assessments.

## Ethical Business Practices

### Anti-Corruption

Sobi is committed to preventing corruption in all its forms, including bribery and facilitation payments. No intermediaries, such as agents, distributors or any other business partners shall be used to commit any act of corruption, including bribery. Partners shall:

- Not bribe any public or private person and not engage in any form of corruption (including bribery) to secure business on behalf of Sobi or any other company.
- Act in accordance with all applicable laws related to corruption and bribery including the UN Convention Against Corruption, Foreign Corrupt Practices Act, UK Bribery Act and any other applicable local laws.
- Avoid any situations or actions that could cause suspicions of corruption.
- Have zero tolerance of all forms of corruption, including giving and receiving of bribes, kickbacks, conflicts of interest, embezzlement, trading in influence, abuse of function or nepotism/cronyism.
- Establish processes to prevent corruption in all its forms, such as by implementing an anti-corruption policy and by providing relevant training to staff.
- Immediately inform Sobi of any situation or action that could constitute a conflict of interest, for example where any Partner, third party or employee have a private and/or professional interest or potential benefit from the situation or action.

## Fair Competition

- Sobi is committed to fair competition and sound business practices. Partners shall respect and comply with applicable competition and antitrust laws and regulations and establish systems to prevent competition law and antitrust infringements.
- Partners shall also prevent their businesses from being used for money laundering or financing terrorism by having established procedures to gain proper knowledge of customers, partners and suppliers, and knowledge and understanding of the purpose of a given business relationship.

## Trade Compliance

- Partners shall comply with all applicable export control, import, trade, and economic sanctions laws and regulations in all jurisdictions in which they operate or conduct activities on behalf of Sobi. Partners shall not engage in any transaction, directly or indirectly, with any country, territory, entity, or individual that is subject to trade sanctions or restrictions imposed by the United Nations, the European Union, the United States, the United Kingdom, or any other applicable jurisdiction.
- Partners shall maintain appropriate internal controls and due diligence procedures to ensure ongoing compliance with applicable trade laws and to identify, assess, and mitigate trade compliance risks.

## Research- and bioethics

Partners engaged in research on behalf of, or in collaboration with, Sobi, shall ensure that research and studies comply with relevant international standards, such as the Declaration of Helsinki and applicable ICH-Good Clinical Practice regulations and guidelines. Studies should be ethically and scientifically reviewed according to relevant regulations and frameworks governing research and development.

## Animal welfare

Research involving animals must be carefully considered and justified. Animal studies should only be considered when the current state of scientific knowledge and applicable guidelines provide no acceptable alternatives to accomplish the purpose of the study. All studies should be based on international norms for animal studies and animal care, with application of the 3R principles of replacement, reduction and refinement and each individual study further framed by protocols on animal welfare.

## Biological material

Sobi expects that its principles on ethical research and management of biological material are respected and consistently applied also by our partners. Partners are expected to comply with all applicable laws and regulations on human biospecimens and associated data and must ensure such compliance through appropriate and transparent internal processes and any contractual arrangements with third parties.

## Protection of information

It is important that patients, customers, employees, Partners and others with whom Sobi interacts can rely on the proper management and processing of information in a responsible and secure manner. Partners shall therefore comply with the following areas to protect information in their relationships with Sobi.

### Information security

Partners must ensure appropriate technical and organisational security measures are applied to protect the confidentiality, integrity and availability of Sobi's or its customers' information and intellectual property. Those measures shall be aligned with ISO/IEC 27001 Standards (or other equivalent and recognized international standards) and shall include, but not be limited to, cyber security training and awareness programs, incident detection and response procedures, recovery capabilities, risk management framework, physical safeguards, access controls, and continuous network and system monitoring. Partners shall ensure Sobi are notified without undue delay of any security incident that poses a risk to Sobi's or its customers' information.

Partners must ensure any subcontractor or third party engaged meet equivalent standards.

### Proprietary information and intellectual property

Partners shall protect Sobi's proprietary information. Information should not be used for any purpose (for example in an advertisement or for publicity) other than the business purpose for which it was provided, unless there is prior written authorisation from Sobi.

Sobi expects Partners to respect and comply with all applicable laws governing intellectual property rights, including patents, copyrights, and trademarks.

### Personal data

Partners shall respect and protect the privacy and personal data of individuals and shall implement appropriate technical and organisational measures to safeguard personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

Where a Partner processes personal data on behalf of, or in connection with, its relationship with Sobi, the Partner shall comply with all applicable data protection and privacy laws and regulations, including, where applicable, the EU General Data Protection Regulation (GDPR).

Partners shall process personal data only for lawful and legitimate purposes, in a transparent manner, and strictly in accordance with Sobi's documented instructions and contractual requirements. Partners shall promptly inform Sobi of any actual or suspected personal data breach or non-compliance affecting personal data processed on Sobi's behalf.

### Artificial intelligence

Partners are expected to use Artificial Intelligence (AI) and other emerging technologies responsibly and ethically. The use of AI must not compromise patient safety, human rights, data privacy and protection, information security, regulatory compliance, or ethical conduct. Partners must ensure

appropriate human oversight, accuracy, and accountability when AI is used in activities related to or on behalf of Sobi and must avoid uses that are discriminatory or misleading.

Partners are required to be transparent about their use of AI in connection with services provided to Sobi and to disclose such use. Partners must cooperate with Sobi by providing timely and complete information reasonably required to assess, validate, or approve AI-related uses, including information about governance, safeguards, data sources, and risk controls. Suppliers must obtain Sobi's prior approval before deploying AI in a manner that may impact patients, healthcare professionals, regulatory activities, personal data, or Sobi's business operations, and must promptly address any concerns or remediation actions identified by Sobi.

## Monitoring

Sobi expects Partner to maintain documented procedures demonstrating compliance with this Code. Sobi's approach to monitoring is intended to be collaborative and ongoing throughout the contractual relationship.

Sobi may ask Partners to provide relevant information and documentation relating to compliance with this Code.

Monitoring will typically be conducted through periodic self-assessments completed by the Partner. Where circumstances warrant, Sobi reserves the right to audit Partner activities relevant to this Code.

## Related documents and resources

The Sobi Partner Code of Conduct is based on the Sobi Code of Conduct, and both can be found on the Sobi website – [www.sobi.com](http://www.sobi.com). The Code will be reviewed and updated on a regular basis. Sobi will communicate changes in connection with the renewals of contracts, and Partners are responsible for ensuring that they comply with the latest version of the Code communicated.

## Change history

This policy is an update of VV-QUAL-POL-00087.