



**ASPEN PHARMACARE HOLDINGS LIMITED AND ITS
AFFILIATES'**

(collectively, the "ASPEN GROUP")

**CODE OF CONDUCT FOR SUPPLIERS AND SERVICE
PROVIDERS (collectively, the "SUPPLIER")**

1. Unless otherwise required or prohibited by applicable laws, the Supplier warrants, to the best of its knowledge, that in relation to the performance of its obligations to the Aspen Group:
 - 1.1. it does not employ engage or otherwise use any child labour in circumstances such that the tasks performed by any such child labour could reasonably be foreseen to cause either physical or emotional impairment to the development of such child;
 - 1.2. it does not use forced labour in any form (prison, indentured, bonded or otherwise) and its employees are not required to lodge papers or deposits on starting work;
 - 1.3. it provides a safe and healthy workplace, presenting no hazards to its employees. Any housing provided by the Supplier to its employees is safe for habitation. The Supplier provides access to proper sanitation, clean water, food, and emergency healthcare to its employees in the event of accidents or incidents at the Supplier's workplace;

- 1.4. it does not discriminate against any employees on any ground (including race, sexual orientation, religion, disability or gender);
 - 1.5. it does not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse and does not use cruel or abusive disciplinary practices in the workplace;
 - 1.6. it pays each employee at least the minimum wage, or a fair representation of the prevailing industry wage, (whichever is the higher) and provides each employee with all legally mandated benefits;
 - 1.7. it complies with the laws on working hours and employment rights in the countries in which it operates;
 - 1.8. it is respectful of its employees right to join and form independent trade unions and freedom of association.
2. The Supplier agrees that it is responsible for controlling its own supply chain and that it shall encourage compliance with ethical standards and human rights by any subsequent supplier of goods and services that are used by the Supplier when performing its obligations to the Aspen Group.
3. The Supplier:
- 3.1. agrees that it is responsible for conducting its business in compliance with applicable environmental laws and regulations when performing its obligations to the Aspen Group; and
 - 3.2. shall ensure that:
 - 3.2.1. it conducts its business in an environmentally conscious manner and insofar as is feasible from renewable resources; and
 - 3.2.2. it minimises the resources used and waste generated by it.

4. The Supplier shall ensure that it has ethical and human rights policies and an appropriate complaints procedure to deal with any breaches of such policies. In the case of any complaints, the Supplier shall report the alleged complaint and proposed remedy to the Aspen Group.
5. The Supplier will not, directly or indirectly, make any payment, offer or promise to make any payment or transfer of anything of value to:
 - 5.1. any government official, or to any political party or any candidate for political office, with the purpose of influencing decisions favourable to the Supplier and/or its business in contravention of applicable laws; and/or
 - 5.2. any employee of the Aspen Group, other than *bona fide* gifts which individually or cumulatively do not exceed the value of US\$200,00 (two hundred United States Dollars).
6. The Supplier will not, directly or indirectly, undertake any act or omission, whether alone or together with any other person or entity, which may contravene any applicable competition/anti-trust legislation, regulations and/or rules.
7. To the extent to which the Supplier undertakes its business activities in the Republic of South Africa, it shall comply with Broad-Based Black Economic Empowerment (“BBBEE”) legislation and policies and on or before 1 May of each year it shall provide the Aspen Group with a BBBEE Rating Certificate issued by an accredited agency.
8. **Tip-Off line:**

Aspen is committed to conducting business in an ethical and honest manner - this protects the name and reputation of the Aspen Group. Aspen has extended the Tip-offs Service (at no cost to you) to allow external stakeholders the opportunity to report any suspected unethical behaviour



on the part of an Aspen employee or anyone related to Aspen's business e.g. acts of bribery, fraud or corruption, anti-competitive behavior, price fixing, etc.

The Tip-offs Anonymous hotline operates 24 hours a day and trained operators will ask callers specific questions to ensure understanding and clarity.

More info can also be found on Aspen's internet site:

<http://www.aspenpharma.com/ethics-management-tip-offs/>

The call-centre can be contact as follows:

Email address: aspenpharmacare@tip-offs.com

FreeCall telephone number:

Australia	1800 623752	Brazil	0800 8914752
Dubai	8000 171111	France	0800 917044
German	0800 1833594	Ireland	1800 552790
Mauritius	8020 270002	Mexico	01800 5142927
The Netherlands	0800 0222147	The Philippines	1800 11101059
South Africa	0800 555657	Venezuela	0800 1003087

Outside of the above territories: +27 31 5715404

Fax: +27 31 5607395

Website: www.tip-offs.com

Postal: Tip-offs Anonymous, PO Box 774, Umhlanga Rocks, 4320, Republic of South Africa

END
