



**Aspen Pharmacare Holdings Limited**

Communication on Progress Report  
in respect of Aspen's application of the  
United Nations Global Compact's  
10 Principles for 2014



10 000 employees

Products distributed in more than 150 countries

16 consecutive years of double-digit growth

# Group Chief Executive's statement



"In its capacity as a signatory to the UN Global Compact, Aspen looks forward to building on its existing reputation for respecting basic human rights, engaging in fair labour practices, being environmentally responsible and having a zero-tolerance approach to corruption."

**Stephen Saad**  
Group Chief Executive

## Aspen's commitment to the UN Global Compact

Aspen became a signatory of the United Nations Global Compact ("the UN Global Compact") with effect from 31 July 2013 and is currently an active participant in this Compact. I am pleased to reaffirm Aspen's support of the 10 Principles of the UN Global Compact in the areas of human rights, labour, environment and anti-corruption.

Regional Ethics Officers, appointed for each business in terms of Aspen's ethics management programme, were required to report on the application of these 10 principles in their regions and now serve as a monitoring resource to ensure these are consistently applied. The Regional Ethics Officers also engaged with the key business leaders in their relevant operations to ensure that they understand these principles and recommendations and implement the processes and controls necessary to support them. The Company Secretary & Group Governance Officer monitors adherence to the Group's Code of Conduct and Ethics management principles and had overarching responsibility on reporting on the application of the 10 Principles throughout the Group.

In its capacity as a signatory to the UN Global Compact, Aspen looks forward to building on its existing reputation for respecting basic human rights, engaging in fair labour practices, being environmentally responsible and having a zero-tolerance approach to corruption.

My thanks go to the Social & Ethics Committee for providing guidance on the implementation of policies and procedures applicable to the Group as a whole in respect of the application of the letter and the spirit of the 10 Principles set out in the UN Global Compact and monitoring the Group's performance in respect of this application.

This Communication of Progress Report describes Aspen's actions to continually improve the integration of the UN Global Compact and its principles into its business strategy, culture and daily operations. Aspen also commits to sharing this information with its stakeholders using its primary channels of communication.

# Section 1 – Human Rights Principles

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** Make sure that they are not complicit in human rights abuses.

## Assessment, policy and goals

Aspen's adherence to fundamental human rights is enshrined in its Code of Conduct, available online, which confirms that "Aspen supports and respects the protection of internationally proclaimed human and employment rights" and confirms its commitment to respecting fundamental human rights and treating all employees and others with fairness, equality and respect to foster an open, transparent, and trusting environment which is free from prejudice, discrimination, bias, harassment and/or violation.

## Implementation

The Aspen Code of Conduct, which requires the formal acceptance of every new Aspen employee, further provides that all employees are responsible for ensuring that Aspen upholds its commitments in respect of Human Rights.

All Aspen suppliers and service providers are required to agree to, or acknowledge, the Aspen Code of Conduct for Suppliers and Service Providers when entering into new commercial agreements with Aspen, thereby ensuring that human rights are respected within Aspen's value chain.

## Measurement of outcomes

Aspen encourages employees and external stakeholders to report any breaches or suspected breaches of its Code of Conduct, including any possible human rights abuses or infringements in terms of Aspen's Whistleblowers' Standard Operating Procedure. An independently monitored whistleblowing hotline, Deloitte's Tip-Offs Anonymous is operated to ensure that these incidents are brought to the Company's attention and these tip-offs can be made on an anonymous basis. All reported incidents are formally recorded and reported to the Social & Ethics Committee for consideration.

There have been no reports of human rights abuses or infringements during the past year (2013: nil).

There are a number of other human resource and ethics-related policy documents, procedures and statements applicable throughout the Group, which confirm Aspen's commitment to protecting basic human rights. These include, among others, the applicable grievance procedures, the Group's whistleblower procedure and respective recruitment and selection policies.

Please refer to page 44 of Aspen's Sustainability Report available online for the 2014 financial year for further information regarding the Group's commitment to respecting human rights and promoting equality.



SHIFT	DAYS	PERFORMANCE						
		WED	THURS	FRI	SAT	SUN		
06:00 - 07:00	ASPH							
07:00 - 08:00	ASPH							
08:00 - 09:00	ASPH							
09:00 - 10:00	ASPH							
10:00 - 11:00	ASPH							
11:00 - 12:00	ASPH							
12:00 - 13:00	ASPH							
13:00 - 14:00	ASPH							
TOTAL								
14:00 - 15:00	ASPH							
15:00 - 16:00	ASPH							
16:00 - 17:00	ASPH							
17:00 - 18:00	ASPH							
18:00 - 19:00	ASPH							
19:00 - 20:00	ASPH							
20:00 - 21:00	ASPH							
21:00 - 22:00	ASPH							
TOTAL								



## Section 2 – Labour principles

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** The elimination of all forms of forced and compulsory labour;

**Principle 5:** The effective abolition of child labour; and

**Principle 6:** The elimination of discrimination in respect of employment and occupation.

### Assessment, policy and goals

The use of child labour, forced labour and/or compulsory labour is strictly prohibited by the Aspen Code of Conduct. This Code also specifically confirms its commitment to the elimination of discrimination in respect of employment policies and practices. Freedom of association and the effective recognition to the right to collective bargaining is also assured in terms of this Code.

### Implementation

The Aspen Code of Conduct, which requires the formal acceptance of every new Aspen employee, provides that all employees are specifically responsible for ensuring that Aspen upholds:

- freedom of association and the effective recognition to the right to collective bargaining;
- the elimination of all forms of forced and compulsory labour;
- the effective abolition of child labour; and
- the elimination of discrimination in respect of employment policies and practices.

All Aspen suppliers and service providers are required to agree to, or acknowledge, the Aspen Code of Conduct for Suppliers and Service Providers when entering into new commercial agreements with Aspen. In terms of this Code each Aspen supplier or service provider warrants, to the best of its knowledge, that in relation to the performance of its obligations to Aspen:

- it does not employ, engage or otherwise use any child labour;
- 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;
- 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;
- it does not discriminate against any employees on any ground (including race, sexual orientation, religion, disability or gender);
- 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;
- 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;
- it complies with the laws on working hours and employment rights in the countries in which it operates; and

- it is respectful of its employees' right to join and form independent trade unions and freedom of association.

All employees are free to belong to trade unions and relationships with trade union representatives, considered to be key stakeholders, are managed in a proactive and responsible manner by site Human Resources managers. Formal processes are in place to foster a culture of transparency and constructive engagement with trade union representatives in each territory.

### Measurement of outcomes

Aspen encourages employees and external stakeholders to report any breaches or suspected breaches of its Code of Conduct, including any possible human rights abuses or infringements in terms of Aspen's Whistleblowers' Standard Operating Procedure. An independently managed anonymous tip-offs hotline is also operated to ensure that these incidents are brought to the Company's attention. All reported incidents are formally recorded and reported to the Social & Ethics Committee for consideration.

During the year, no incidents of discrimination, forced labour or compulsory labour were found to exist in the Group (2013: nil). These aspects are monitored in respect of all business units. In addition, there were no reported incidents in the Group where the rights of indigenous people were violated. Furthermore, no businesses in the Group have been considered to be at risk of violating human rights which protect child labour, forced or compulsory labour.

Employees across the Group are free to exercise their rights to belong to trade unions and collective bargaining councils – at year-end approximately 24% of the Group's employees were members of a trade union and approximately 26% were represented by collective bargaining councils.

Please refer to pages 36 to 44 of Aspen's Sustainability Report available online for the 2014 financial year for further information regarding the Group's commitment to respecting employee rights. Please also refer to pages 47 to 49 for further information on Aspen's efforts around employee health, wellness and safety.



# Section 3 – Environmental principles

**Principle 7:** Businesses should support a precautionary approach to environmental challenges;

**Principle 8:** Undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** Encourage the development and diffusion of environmentally friendly technologies.

## Assessment, policy and goals

Consistent with its commitment as a responsible corporate citizen to contribute to sustainable development, Aspen's Code of Conduct confirms that it exercises a systematic approach to health, safety, quality and environmental management in order to achieve continuous performance improvement and compliance to relevant legislation, regulations and guidelines.

Aspen recognises the importance of supporting global initiatives aimed at protecting the environment and conserving natural resources. Aspen's environmental management philosophy, available online, advocates containment of the carbon footprint across the supply chain in a technically and economically feasible manner. This is further promoted in the Group's Responsible Corporate Citizenship Philosophy.

The Aspen environmental management protocol also acknowledges that the responsible management of the environment is an integral part of the sustainability of Aspen's operations and confirms that environmental management, protection and conservation will be incorporated into Aspen's value chain and be promoted by the following principles:

- ensuring compliance with relevant environmental regulations and legislation governing the responsible manufacture and supply of Aspen's products;
- carrying out of environmental risk assessments to identify actual and potential environmental impacts emanating from our operations;
- conducting of environmental risk assessments and/or audits to evaluate the level of environmental compliance and the effectiveness of the applied environmental management system;
- promoting the efficient use of resources such as energy, water, paper and production materials with due regard to the scarcity of natural resources and the environmental impact resulting from the utilisation and application of such resources in conducting our business activities;
- containment and reduction of our carbon footprint in our operations and in the broader supply chain in a technically and economically feasible manner through structured systems of environmental monitoring, reporting and management;
- monitoring and measuring the quality of air emissions and waste water discharge against benchmarked standards and legal requirements through accurate and effective systems of measuring, reporting and controls;
- the engagement of external experts or consultants to seek independent assurance on the levels of environmental compliance and/or for value-added advice on technically complex matters pertaining to environmental management;
- responsible management of waste through the selection of effective and feasible methods of waste disposal which are aligned to the waste hierarchy;
- implementing robust waste management control systems to safeguard raw materials, packaging materials and finished goods against unauthorised use and to ensure that these waste products are disposed of in accordance with required specifications in a controlled manner;

- promoting extended producer responsibility in a pragmatic manner and ensuring compliant waste management principles and practices are implemented throughout the supply chain until the final disposal of waste material by an approved and accredited waste management service provider; and
- enhancing environmental training and awareness for our employees and contractors to encourage responsible environmental practices in the workplace which, in turn, supports the preservation of the broader environment within which the Company operates.

## Implementation

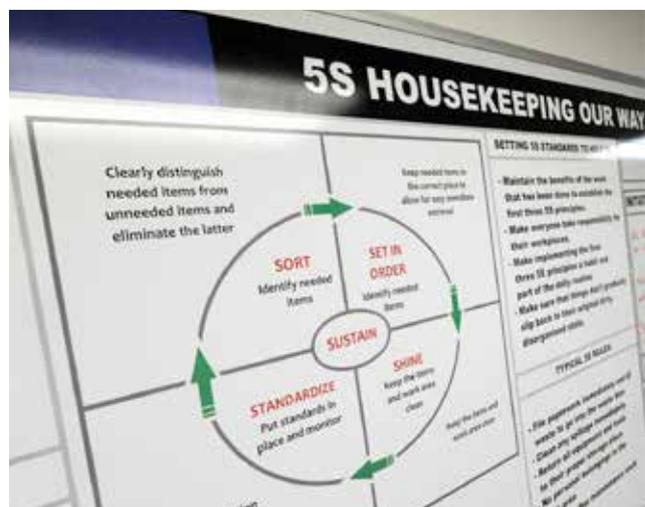
Aspen's Board monitors the status of environmental risks through review of material environmental management performance indicators at scheduled intervals. The Social & Ethics Committee assists the Board in monitoring the adequacy of environmental management systems in the Group and the extent to which these comply with relevant legislation.

Designated business unit executives are responsible for ensuring compliance with all relevant environmental legislation and implementation of Aspen's environmental management philosophy, as appropriate. Under the direction of the Group Strategic Operations Executive, the Group SHE department monitors the alignment of business unit environmental management systems to the Group standards, develops and promotes Aspen's environmental management protocol, and monitors environmental legislative compliance across the Group's manufacturing facilities.

The Aspen Code of Conduct for Suppliers and Service Providers also requires that Aspen's suppliers and service providers undertake responsibility for conducting business in compliance with applicable environmental laws and regulations when performing their obligations to Aspen and ensuring that they conduct their business in an environmentally conscious manner and insofar as is feasible from renewable resources, while minimising the resources used and waste generated by them.

## Measurement of outcomes

Please refer to the Aspen Sustainability Report for the 2014 financial year available online, specifically pages 50 to 53, for the full details in respect of the Group's efforts to protect the environment and to conserve natural resources.



## Section 4 – Anti-corruption principles

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

### Assessment, policy and goals

Aspen has a zero-tolerance approach to unethical behaviour and is committed to ensuring that the Group and its employees uphold Aspen's laudable reputation. The Group Code of Conduct governs the conduct of all Aspen's employees throughout the Group and is aligned with the Organisation for Economic Co-operation and Development recommendations regarding corruption.

Aspen fosters honesty, integrity and fairness in all aspects of its business and expects the same in its relationships with all those with whom it does business.

Aspen is committed to the fight against bribery. As a result, it is unacceptable for any employee or agent of Aspen to directly or indirectly offer, pay, solicit or accept bribes in any form.

### Implementation

A formalised ethics management programme has been implemented at all of the Group's businesses. This programme is managed by the Company Secretary & Group Governance Officer under the direction of the Social & Ethics Committee and is aimed at:

- ▶ assisting the Audit & Risk Committee and the Social & Ethics Committee in assessing the Group's ethics profile, risks and opportunities; and
- ▶ assisting the Social & Ethics Committee to monitor implementation and compliance with the Group's policies which guide expected ethical behaviour.

Aspen's induction programme educates new employees on the ethics, values and the business philosophy of the Group. All new employees are given a copy of, and are required to sign an acceptance of the Code of Conduct on commencement of their employment with the Group. The Code of Conduct is available to all employees on the Group's intranet and is also contained in the employee handbook.

The Group conducts its business in a highly regulated environment, however, one in which the potential for unethical marketing and promotional practices remains inherent. Aspen endorses the ethical marketing of medicines and adheres to the principles contained in the marketing codes to which it subscribes. The Group has a written policy on gifts and benefits in terms of which employees of the Group, including directors, are prohibited from accepting or giving gifts or hospitality that are not of a nominal value or participating in events sponsored by current or prospective customers or suppliers. Any employee who receives a gift or other benefit exceeding the local currency equivalent of USD100 is required to disclose this in writing to the Company Secretary & Group Governance Officer. Some types of gifts, benefits or entertainment are prohibited even if the value falls below this threshold. A Group-wide register of gifts is maintained by the Company Secretary & Group Governance Officer and is noted by the Social & Ethics Committee on a periodic basis. This register is also made available for inspection by the Board or any member of senior management on request.

Aspen does not make payments or other contributions to political parties, organisations or their representatives or take part in party politics. Employees are free to participate in the political process in their private capacity provided it does not constitute a breach of the principles set out in the Code of Conduct and/or the relevant employee's obligations to Aspen

under contracts of employment and does not negatively influence their productivity or the credibility of the Group.

Aspen endeavours to promote a culture of openness and transparency throughout the Group and employees and other stakeholders are encouraged to report unethical conduct and other transgressions of which they become aware.

An independently monitored whistle-blowing hotline, Deloitte's Tip-Offs Anonymous, has been made available to employees across the Group's businesses, whereby employees can report suspected fraud and/or activities which are considered to be transgressions of the Group's Code of Conduct. Tip-offs training and awareness sessions are conducted periodically to promote utilisation of the facility where necessary. The tip-offs service has also been extended to key customers and suppliers in the South African business. The implementation of this service to selected suppliers and customers at Aspen's International businesses is in progress. The details in respect of this hotline are available on Aspen's website.

The Board has adopted a formal policy to regulate conflicts of interest and trading in the Company's securities.

### Measurement of outcomes

All logged tip-off calls and internal reports in regards to possible incidents of fraud, theft and corruption were reported to the responsible functionaries within Aspen. Corrective action has been implemented where necessary to improve controls and to prevent recurrence of any incidents found to be in breach of Aspen's stated policies and Code of Conduct.

Quarterly reports detailing the tip-offs received, how these tip-offs have been investigated and the corrective measures taken are submitted to the Audit & Risk Committee and Social & Ethics Committee as appropriate. There have been no material incidents of fraud, theft or corruption during the year.

A review of the effectiveness of the Group's ethics management programme was performed during the year and the programme was found to be effective in all material respects.

Please refer to pages 2 to 4 of Aspen's Social & Ethics Committee report available online for more information on its approach to unethical conduct, including corruption, and the Group's ethics management programme.





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