



# Third Party Code of Conduct

The Veterinary Perspective



## Who we are and the purpose of this document

Dechra Pharmaceuticals is an international specialist veterinary pharmaceuticals and related products business. Our expertise is in the development, manufacture, sales, and marketing of high quality products exclusively for veterinarians worldwide.

We are committed to acting responsibly and with integrity, respecting the laws, regulations, traditions, and cultures of the countries within which we operate. This is reflected through our "Dechra Values", the core principles by which we operate.

As our customers and suppliers, we expect you to trade with honesty and integrity.

Therefore, it is important to us that you take the time to read this document to ensure that your own business practices are aligned with the standards set out below in relation to Business, People, the Environment, and Management Systems.



### **Dedication**

Committed to delivering excellence



### **Enjoyment**

Having enthusiasm for everything we do



### **Courage**

Being prepared to leap into the unknown



### **Honesty**

Having integrity and trusting those around you



### **Relationships**

Working together to reach our goals



### **Ambition**

Striving to be the best



## Business

### Anti-Bribery and Anti-Corruption

We are fully committed to conducting business in a way that is honest and fair and are committed to preventing bribery and corruption in any part of the world in which we trade. Any and all forms of corruption, extortion, and embezzlement are prohibited.

As a Third Party working with Dechra, you **shall** take all reasonable steps to ensure that you:

- ✓ comply with all anti-bribery and anti-corruption laws applicable in the jurisdictions in which you are based;
- ✓ have in place your own standards and procedures to ensure compliance with relevant anti-bribery legislation;
- ✓ promptly report to us any acts or omissions contrary to any anti-bribery law or the standards contained in this document;
- ✓ inform us immediately should any of your officers or employees be convicted of any bribery or corruption offence, or are the subject of any investigation or enforcement proceedings in connection with bribery or corruption offences.

You **shall not**:

- ✗ directly or indirectly give, offer, promise, receive, solicit, agree to or accept a bribe, or authorise anyone to do so;
- ✗ participate in corrupt or other illegal business such as offering, promising or giving a bribe to a public official, fraud, embezzlement and/or bid rigging;
- ✗ make or receive any facilitation payments (irrespective of whether or not local law permits them);
- ✗ give or receive gifts, hospitality or expenses to or on behalf of Dechra where these could affect or be perceived to affect the outcome of business transactions, or that are not reasonable and/or bona fide;
- ✗ participate in political activities (e.g. lobbying) nor give any political support (e.g. finance or resource any political campaigns) on behalf of Dechra; or
- ✗ allow any conflict of interest to influence or compromise your decisions, independence or personal judgement.

## Sanctions



In relation to International Sanctions laws affecting your and our businesses, you shall at all times observe any sanctions imposed by the sanctions authorities and have in place the appropriate clearance and/or licences in respect of such sanctions.

## Data Protection and Confidentiality



You shall collect, use, retain and disclose any personal data relating to us, our employees, customers, suppliers, pet owners or subjects in a legal, transparent and secure manner in order to minimise the adverse impact on the rights of data subjects.

You shall ensure personal data is:

- ✓ only used appropriately for necessary business purposes and in accordance with our instructions;
- ✓ secure and protected at all times from unauthorised use, loss, misuse, theft, fraud, improper access, disclosure, alteration or removal by having in place effective organisational and security measures to protect it;
- ✓ only accessed by appropriately trained individuals and that a representative is appointed for the purposes of data protection and privacy; and
- ✗ never transferred to another party without our prior express written consent.

You shall maintain confidentiality at all times and agree to be bound by the terms of any confidentiality agreements we ask you to enter into. If confidential information is to be shared then you must ensure that any such communication is authorised by us and disclosure is strictly limited to individuals who have a “need to know”.

## Tax Evasion and Fraud



You shall not engage in activities which are fraudulent or are undertaken for the purposes of tax evasion and you shall have in place reasonable reporting and prevention systems for such activities. In the event of any occurrence of fraudulent activity involving our business or products, whether actual or suspected, you must report such activity to us without delay.

## Anti-Competitive Practices



You shall conduct your business in a manner which is consistent with fair competition and in compliance with all applicable anti-trust laws. If you are dominant or have a monopoly, you shall not abuse your position to exclude competitors or exploit customers.

## Product Security



We take counterfeiting and illegally traded medicines very seriously. You must:

- ✓ have the appropriate procedures in place to ensure the traceability of finished products, as well as monitor and record any waste, surplus, returned or discarded products;
- ✓ notify us without delay of any incident you become aware of relating to counterfeit or illegally traded medicines;
- ✗ not be involved in any activity related to counterfeit or illegally traded medicines.

## Product Communication and Promotion



You shall:

- ✓ employ fair business practices including accurate and truthful advertising;
- ✓ only provide information (whether in written or oral form) about our products when authorised to do so;
- ✓ only use promotional materials that have been produced or previously approved by us



## People

We are committed to upholding and respecting human rights both within our business and from our Third Parties.

### Modern Slavery, Freely Chosen Employment and Child Labour

Dechra's Modern Slavery Statement and Human Rights Policy are both available in the Sustainability section of our website. The principles set out in those documents form an integral part of our expectations of our third party network and should be read in conjunction with this document.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Dechra has a zero-tolerance approach to modern slavery and expect the third parties with whom we work to implement and enforce effective systems and controls to prevent modern slavery from taking place anywhere in their own business.

- ✘ You shall not use forced, bonded or indentured labour or involuntary prison labour or take part in human trafficking.
- ✘ You shall not use child labour. The minimum age for employment is 15 years of age. However, if: and shall comply with international standards on the minimum age for employment;
- ✘ You shall not place any financial burdens on workers within your own operations and shall verify that any employment or recruitment agencies you engage do not do so either;
- ✘ You shall not place any unreasonably restrictions on a worker's freedom of movement, and not sure workers who have been required to pay for the opportunity to do the job;
- ✓ You shall only use workers who have freely chosen to work with you and who are free to leave their employment at any time.

## Wages, Benefits and Working Hours



You shall pay employees according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. In addition they shall have working hours that comply with national laws.

## Non-Discrimination



You shall provide a workplace free of harassment and discrimination. Discrimination for reasons such as race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status is not condoned by us and should not be condoned by you.

## Fair Treatment



You shall provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, and no threat or any such treatment.

## Freedom of Association



You shall engage in open and direct communication with workers to resolve workplace and compensation issues, without threat of reprisal, intimidation or harassment. You shall respect the rights of your workers to associate freely with, join or not join labour unions, workers' councils or seek representation.



## Environmental

### Animal Welfare and Research and Development Ethics

If you undertake trials which involve animals you shall apply the following principles to all animal studies and to the breeding and supplying of animals for use in such studies. You shall ensure that:



- ✓ all animals shall be treated humanely with the greatest consideration given to their health and welfare and consistent with meeting the necessary scientific objectives;
- ✓ all animal studies shall only be performed after considering whether the numbers of animals can be reduced, replaced or the procedures refined to minimise distress.

## Health & Safety

The health and safety of employees and the public is of the utmost importance to us. You shall:



- ✓ provide a safe and healthy working environment;
- ✓ protect workers from over exposure to chemical, biological, physical hazards and physically demanding tasks;
- ✓ have programmes in place to prevent or mitigate catastrophic releases of chemicals;
- ✓ identify and assess emergency situations and minimise their impact by implementing emergency plans and response procedures both in the workplace and any company provided living quarters;
- ✓ make available safety information relating to hazardous materials, including pharmaceuticals compounds and pharmaceutical intermediate materials to educate, train and protect workers from hazards.



## Environmental Protection and Conservation

We have adopted responsible environmental practices, giving consideration to minimising the impact of our operations on the environment and complying with applicable environmental legislation. You shall work with us to maintain this approach by:



- ✓ operating in an environmentally responsible and efficient manner to minimise adverse impacts on the environment;
- ✓ complying with all applicable environmental regulations, obtaining and following the terms of all required permits, licences, information registrations and restrictions;
- ✓ having in place appropriate systems to ensure the safe handling, movement, storage, disposal, recycling, reuse and management of waste, emissions and wastewater discharges



- ✓ preventing and mitigating accidental spills and releases to the environment through effective management systems;
- ✓ taking steps to conserve energy and natural resources, avoiding the use of hazardous materials where possible and engaging in activities that reuse and recycle materials;
- ✓ carrying out due diligence on the source of critical raw materials to promote legal and sustainable sourcing.



## Management Systems

We have effective management systems in place to maintain business continuity and ongoing compliance with the principles set out in this document. You shall do the same by:



- ✓ allocating appropriate resources and personnel to demonstrate compliance with and commitment to these principles;
- ✓ putting in place mechanisms to determine and manage risks in all areas addressed in this document;
- ✓ maintaining the necessary documentation to demonstrate conformance with these principles and compliance with all applicable laws and regulations;



- ✓ training your workers to achieve an appropriate level of knowledge, skill and ability to address the expectations set out in this code;
- ✓ striving for continual improvement and taking the necessary corrective actions for any deficiencies identified;
- ✓ effectively communicating these principles to your workers, customers and suppliers.

## Raising a Concern

If you have any questions about these standards, or you come across a situation which you think is in violation of any of these standards, please report this by emailing us at:

[ComplianceConcerns@dechra.com](mailto:ComplianceConcerns@dechra.com), or you can report an issue via our confidential external hotline by telephone ([www.safecall.co.uk/freephone](http://www.safecall.co.uk/freephone)) or secure web portal ([www.safecall.co.uk/report](http://www.safecall.co.uk/report)).

## Acknowledgement

We acknowledge receipt of this code and agree to and confirm the terms herein.

Signed :

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Print Name :

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Position :

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Dated :

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Company  
Name:

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