

# **Ethical Trade Initiative Policy**

## **OUR COMMITMENT TO HUMAN RIGHTS**

At Tris we strongly believe in ethical principles and good stewardship, and we are committed to ensuring that our employment practices and the enforcement of corporate regulations ensure the protection of the rights of all those who work for us. While governments have a key role to respect, protect, promote, and fulfill the human rights of their citizens, we recognize that companies share this responsibility to respect human rights within their own operations and through business relationships. Tris is committed to preventing, mitigating and remedying any adverse human rights across our value chain.

Tris does not tolerate human rights abuses. We expect all employees, contractors, subsidiaries, suppliers, and business partners to abide by this commitment. Tris contributes to the realization of human rights through compliance with laws and regulations wherever we have operations, and through our policies, practices, and programs.

Our commitment to human rights is supported by our policies on employment, ethics, and procurement. These policies are designed to ensure that neither we, nor our suppliers or partners, engage in human rights abuses.

Three aspects of our business and operations as a pharmaceutical company are particularly relevant: workplace, clinical trials, and supply chain.

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| <b>1. Employment is freely chosen.</b>   |
| <ul style="list-style-type: none"><li>• There is no forced, bonded or involuntary prison labor.</li><li>• Workers are not required to lodge monetary deposits or their identity papers with their employer and are free to leave their employment after reasonable notice.</li></ul> |



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| <b>2. Freedom of association and the right to collective bargaining are respected.</b>  |
| <ul style="list-style-type: none"><li>• Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</li><li>• The employer adopts an open attitude towards the activities of trade unions and their organizational activities.</li><li>• Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</li><li>• Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates and does not hinder the development of parallel means for independent and free association and bargaining.</li></ul> |



Tris appoints a designated individual to be responsible for Human Rights at Tris and compliance with Tris' stated policies.

We have policies, procedures, and practices in place to evaluate and address workplace concerns raised by employees and to ensure compliance with applicable laws. We also verify that all employees have the right to work in the country in which they work. We provide training to employees on anti-harassment

and anti-discrimination policies and practices. Tris' anti-harassment/discrimination policy applies to all employees, applicants, vendors, customers, clients or any third party engaged in business with Tris.

Employees should promptly report any known or suspected breach of our policies or illegal or unethical behavior. We offer several resources such as our confidential Ethics and Compliance Helpline ([trispharma.ethicspoint.com](http://trispharma.ethicspoint.com) or 844-956-3287) a telephone- and web-based hotline maintained by a third party for the purpose of gathering information regarding compliance and ethics concerns. Employees may also contact our Head of Human Resources or General Counsel. Tris does not tolerate retaliation against individuals making a good faith report. Any employee found to be involved in inappropriate conduct or in violation of our Code of Conduct, our policies, our procedures and/or applicable laws or regulations is subject to corrective action, up to and including termination of employment.

3. Working conditions are safe and hygienic.

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.
- Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable the causes of hazards inherent in the working environments.
- Workers shall receive regular and recorded health and safety training and such training shall be repeated for new or reassigned workers.
- Workers shall be provided with access to clean toilet facilities and to potable water, and, if appropriate sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers.

The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

4. Child labor shall not be used.

- There shall be no new recruitment of child labor.
- Companies shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labor to enable her or him to attend quality education until no longer a child.
- Young persons under 18 shall not be employed at night or in hazardous conditions.
- These policies and procedures relating to Child Labor shall conform to the provisions of the relevant International Labor Organization (ILO) Standards.

5. Remuneration

- Wages and benefits paid for a standard working week meet, at a minimum, national legal or industry benchmark standards, whichever is higher. In any event wages shall always be enough to meet basic needs and to provide some discretionary income.
- All workers shall be provided with written and understandable information about their employment conditions including information with respect to wages before they enter employment, and about the particulars of their wages for the pay period concerned each time they are paid.

• Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive.

- Working hours must comply with national laws, collective agreements, and the provisions defined in the clauses below, whichever affords the greater protection for workers.
- Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay, except where a consolidated rate of pay has been negotiated with worker representation.
- The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by the clauses below.
  - o this is allowed by national law;
  - o this is allowed by a collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce;
  - o appropriate safeguards are taken to protect the workers' health and safety; and
  - o the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents, or emergencies.
- Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

7. No discrimination is practiced.

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided.

- To every extent possible work performed must be based on recognized employment relationships established through national law and practice.
- Obligations to employees under labor or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labor-only contracting, sub-contracting and home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed.

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidations shall be prohibited.

10. Entitlement to work.

- Only workers with a legal right to work in the country should be employed.

- For both workers and agency workers, original documents should be reviewed and then returned to workers to verify right to work.

#### 11. Labor Providers

- Labor providers should only supply workers registered with them.
- Relationships with Labor providers should be covered by a Service Level Agreement which meets all national legal requirements.
- Labor providers should be audited on a regular basis to ensure compliance with all national legal requirements.
- Labor providers should not charge workers for finding them a job or for services that are integral to the workfinding process.

#### 12. Environment

- At a minimum, suppliers, sites and growers must comply with the requirements of all local and international environmental laws and regulations including having necessary permits. In addition, they must meet all relevant Tris standards relating to the environment.

### **Employment Agencies**

Employment agencies contracted to supply temporary staff shall demonstrate commitment to and application of the requirements of this policy.

### **Clinical Trials**

Our clinical trials policies, programs and management systems are designed to respect the human rights of clinical trial participants. To ensure these studies are conducted in accordance with the highest standards of protection for individual participants, Tris strictly follows important rules governing clinical research. Key clinical trials sponsored by Tris for branded drugs are listed on publicly accessible clinical trial registries in the United States, and other countries where applicable and required by law. Regardless of outcome, we strive to publicly make available our clinical trial outcomes.

### **Supply Chain**

Tris is committed to monitoring social standards in our supply chain, and we encourage our suppliers to operate the same ethical standards we employ ourselves.

As a supplier, Tris complies with all local and country-level laws and regulations related to minimum age of employment at all locations. Tris participates in SEDEX (Supplier Ethical Data Exchange), which is a non-profit membership organization dedicated to driving improvements in ethical and responsible business practices in global supply chains. It is a web-based platform for sharing information and audit results on four pillars: (1) labor standards; (2) health and safety; (3) environment; (4) business integrity. As a member, Tris is committed to conducting audits annually and sharing these results within SEDEX.

Our suppliers are integral to the success of our Company. Each day, Tris and its suppliers make decisions that impact Tris' ability to provide quality health care products to its customers. While we cannot control all actions of our suppliers, we expect suppliers to support the fundamental principles of human

dignity and respect, and to comply with all legal and regulatory requirements pertaining to the fair and equitable treatment of employees, including:

- Be committed to the fair treatment of their employees
- Ensure working hours are not excessive and that no discrimination is practiced
- No harsh, cruel or degrading treatment or practices are allowed, and no bribery, corruption, blackmailing or bullying is permitted
- Maintain employee files with adequate data to verify ages of employees
- Not use child labor
- Ensure all work is freely chosen and that working conditions are safe and hygienic
- Not use forced, bonded or indentured labor, involuntary labor or human trafficking
- Pay workers according to applicable wage laws, including minimum wage, overtime hours and mandated benefits as per custom of the country of employment

Suppliers are strongly encouraged to contact Tris whenever there are questions relating to the appropriateness of any activity. Suspected supplier misconduct may be reported to Tris via the Ethics and Compliance Helpline ([trispharma.ethicspoint.com](http://trispharma.ethicspoint.com) or 844-956-3287). Anyone discovered to be involved in inappropriate conduct or in violation of our Code, our policies, our procedure and/or applicable laws or regulations, is subject to corrective action, up to and including termination of business with the supplier.

Third party suppliers and buyers are both free to sell and buy from any number of other businesses. No restrictions, as a way of guaranteeing business are allowed.

Tris appoints a designated individual to be responsible for Supply Chain compliance with Tris' stated policies.