

MAYNE PHARMA GROUP LIMITED

SUPPLIER CODE OF CONDUCT

1. INTRODUCTION

Mayne Pharma has a long-standing reputation for integrity and ethical business conduct, enabling it to build and maintain the confidence, respect and trust of its business partners, customers, shareholders, employees, and communities. This Supplier Code of Conduct sets out the expectations Mayne Pharma has of its Suppliers, including their employees and sub-contractors working on their behalf. Suppliers are expected to conduct their activities in accordance with the highest legal, ethical, and professional standards.

Suppliers with whom Mayne Pharma does business should carefully read and understand this Supplier Code of Conduct and must agree to abide by its requirements as a condition of doing business with all legal entities of Mayne Pharma worldwide. Failure to comply could result in Mayne Pharma ceasing to do business with a Supplier. The current version of this Supplier Code of Conduct can be found at maynepharma.com/investor-relations/corporate-governance/.

2. LABOUR AND HUMAN RIGHTS

Labour Expectations: All labour must be voluntary. Suppliers must not use slave, child, underage, forced, bonded or indentured labour. Suppliers must adopt procedures to ensure they comply with laws against slavery and human trafficking. Workers must have the right to engage in work voluntarily, and a Supplier must not require workers to:

- surrender control over original identification papers or documents giving foreign workers the right to work; or
- pay fees for the right to work.

Non-Discrimination: Suppliers must take steps to provide a workplace free of harassment and discrimination. Discrimination for reasons such as race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, military status, union membership, marital status or pregnancy status is not tolerated.

Fair Treatment: Suppliers must take steps to 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 without threat of any such treatment.

Wages, Benefits, & Working Hours: Suppliers must comply with and pay workers according to applicable remuneration laws..

Freedom of Association: Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Suppliers must respect the rights of workers, as set forth in local laws, to associate freely, join or not join labour unions, seek representation and join workers' councils.

3. HEALTH AND SAFETY

Safe and Healthy Workplace: Suppliers must provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations.

Worker Protection: Suppliers must provide workers with protection from exposure to chemical, biological and physical hazards and physically demanding tasks in the work place and in any company provided living quarters.

Emergency Preparedness and Response: Suppliers must identify and assess emergency situations in the workplace and any company provided living quarters, and to minimise their impact by implementing emergency plans and response procedures.

Hazard Information: Safety information relating to hazardous materials - including pharmaceutical compounds and pharmaceutical intermediate materials - must be available to educate, train, and protect workers from hazards.

Business Continuity Planning: Supplier must be prepared for any material disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases). This preparedness especially includes disaster plans to protect both employees as well as the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

4. ENVIRONMENTAL RESPONSIBILITIES

Suppliers must comply with all applicable environmental regulations and laws (i.e., permits, licenses, information registration, and operational and reporting requirements) and must operate in an environmentally responsible manner. Suppliers are committed to the environment and to work to conserve natural resources, avoid the use of hazardous materials where possible and to engage in activities that reuse and recycle.

5. BUSINESS PRACTICES AND ETHICS

Business Integrity and Fair Competition: Suppliers must operate in full compliance with all applicable local laws and other applicable internationally agreed law, rules and regulations related to worker welfare, health and safety, and environmental compliance. All corruption, extortion and embezzlement are prohibited. Suppliers must not pay or accept bribes or participate in other illegal inducements in business or government relationships. Suppliers must conduct their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws. Suppliers must employ fair business practices including accurate and truthful advertising.

Conflicts of Interest: A Supplier must avoid the appearance of or actual improprieties or conflicts of interests and must not, to its knowledge deal directly with any Mayne Pharma employee or director, or a Mayne Pharma employee's spouse, domestic partner, or other family member or relative that holds a significant financial interest in the Supplier.

International Boycotts: Suppliers must not participate in international boycotts that are not sanctioned by the United States (U.S.) Government or applicable laws. If a Supplier receives a request to participate in any way with an international boycott, or suspect a request is received, the Supplier must notify Mayne Pharma immediately.

Business Records: Suppliers must accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy. Business records must be retained and disposed of in full compliance with all applicable legal and regulatory requirements.

Privacy: Suppliers must safeguard and make only proper use of confidential information to ensure that company, worker, and patient privacy rights are protected in all jurisdictions in which such information is intended to be used.

Conflict Free: Suppliers must ensure goods supplied to Mayne Pharma contain no Conflict Minerals.

6. CODE OF CONDUCT ADHERENCE

In the event that the requirements of this Code are stricter than applicable local, national or international law, Supplier must comply with this Code. However, if there are any conflict(s) between the requirements



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of this Code and the requirements of any applicable local, national or international law, Supplier is to comply with the local, national or international law. Supplier must notify Mayne Pharma in writing of any such conflicts.

7. TRAINING

This Supplier Code of Conduct is communicated with all applicable Mayne Pharma employees to ensure staff are trained and aware of the standard required.

8. REPORTING POTENTIAL MISCONDUCT

Whenever possible, Suppliers should contact their primary Mayne Pharma contact with any complaints or concerns regarding questionable behaviour or a possible violation of this Supplier Code of Conduct and other matters such as illegal or unethical activity. If necessary, visit the Mayne Pharma Help Line website, which provides an alternative channel to communicate concerns confidentially and where permitted by local law, anonymously. Website: <https://maynepharma.ethicaladvocate.com>.