



Organon Business Partner Code of Conduct

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Business Partner Code of Conduct

Organon is committed to ensuring compliance with the highest ethical, social, and environmental standards and to meeting increasing sustainability regulations. We value our business partners and strive to work with those who share our commitment to responsible practices.

This Business Partner Code of Conduct (BPCoC) outlines our expectations and sets the foundation for responsible, transparent, and sustainable partnerships.

This Business Partner Code of Conduct is overseen by the Organon's Chief Procurement Officer and Head of ESG.

Standards

We support the 17 UN Sustainable Development Goals (SDGs) and are signatories to the United Nations Global Compact Principles and the Universal Declaration of Human Rights (UDHR). As a member of the Pharmaceutical Supply Chain Initiative (PSCI), our Code of Conduct aligns with the PSCI Principles. These standards serve as guiding principles for ethical conduct and responsible business practices within our organization and our business partners.

Compliance

It is essential for all partners to act in compliance with applicable federal, state, provincial, international, and local laws and regulations governing their operations in all regions where they conduct business. This Business Partner Code of Conduct does not supersede any local laws, rules, or regulations that partners are obligated to adhere to.

Applicability

The Business Partner Code of Conduct applies to any external entity or organization that provides goods, services, or resources to our company. The term "business partners" includes suppliers, service providers, vendors, contractors, and other entities with whom we have entered into a business relationship.

Assessing compliance with Organon Business Partner Code of Conduct

Business partners are expected to assess their compliance with the Principles outlined in our company BPCoC.

- Carefully read and understand the Principles outlined in the BPCoC.
- Evaluate their existing policies, procedures, and practices to determine if they meet the Principles set forth in the BPCoC.
- Identify any areas where their current practices may not align with the BPCoC.
- Take appropriate actions to address any gaps or non-compliance found.
- This may involve updating policies or operations to align with the BPCoC.
- Strive for ongoing improvement to enhance own practices.

Expectations towards Business Partners

Business partners are expected to

- Conduct their business and operations in an ethical manner and act with integrity.
- Operate in full compliance with all applicable laws, rules and regulations.
- Firmly uphold internationally recognized human rights and fair labor standards, and compliance with environmental, health and safety regulations.
- Provide a safe and healthy working environment.
- Operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment.
- Use management systems to facilitate compliance with the expectations of these principles and integrated into a continuous improvement approach that advances their performance objectives.
- Ensure that all products and services meet Organon's high standards of quality and safety.
- Provide access to facilities as well as necessary information for compliance audits and risk assessments conducted by Organon and delegated third parties in a timely and accurate manner. Collaborate on action plans to remediate identified issues, fostering sustainable partnerships and long-term value.
- Integrate, communicate and apply these principles to their own operations as well as to their business partners.

Labor & Human Rights

Business partners shall conduct their business and operations in compliance with all Labor laws and in a manner that respects Human Rights including:

Benefits

Workers shall be provided with all benefits mandated by applicable labor laws, including but not limited to the areas of paid leave, Social Security, retirement benefits, and maternity/paternity leave.

Child Labor & Young Workers

Child labor shall not be used. The employment of young workers under the age of 18 must comply with all relevant laws and regulations related to age restrictions, working hours, fair compensation, and health and safety.

Employment Practices

Only recruiters (agencies) that comply with local labor laws shall be used. Partners and recruiters acting on their behalf will not: (i) withhold or prevent a worker from accessing his or her identity or immigration documents or (ii) charge workers recruitment or placement fees.

Equal Opportunity

Equal opportunity throughout their operations and supply chain shall be promoted with the aim to foster an inclusive and equitable business environment that respects the rights and dignity of all individuals.

Fair Treatment

A workplace free of harassment, as well as free from any other harsh and inhumane treatment, including but not limited to, any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuses of workers shall be provided by business partners.

Freedom Of Association

Business partners shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils. Workers should be able to communicate openly with management regarding working conditions without fear of retaliation.

Freely Chosen Employment

Any form of forced or involuntary labor, including bonded labor, prison labor or indentured labor shall not be used. Business Partners will not engage in any form of slavery or human trafficking. All work must be voluntary, and workers shall be free to terminate their employment at any time. No unreasonable restrictions will be placed on a worker's freedom of movement.

Indigenous People and Local Communities

Business partners shall conduct operations and activities in a manner that upholds the human rights of local communities, including their right to a clean and healthy environment.

Non-Discrimination

Business partners shall also provide a workplace free from any form of discrimination based on race, color, gender, pregnancy, age, religion, national origin, ancestry, ethnicity, disability, sexual

orientation, disability, political affiliation, union membership, marital status, or any other characteristic protected by applicable laws.

Privacy & Data Protection

Business partners shall respect individuals in a manner consistent with the rights to privacy and data protection. They should use information about people appropriately for necessary business purposes and protect it from misuse.

Responsible Sourcing Of Minerals

Business partners in Organon's supply chain shall maintain processes and procedures to ensure the responsible sourcing of minerals. Conflict minerals refer to minerals sourced from regions or countries where their extraction and trade contribute to armed conflict, human rights abuses, or environmental damage. Partners will endeavor to avoid the purchase of minerals that directly or indirectly finance or benefit armed groups or perpetrators of serious human rights abuses. When requested by Organon, partners shall provide information that shows the source and origin of minerals used by the partner.

Wages

Business partners shall pay their workers according to applicable wage laws and agreed employment contracts. They are expected to clearly and promptly communicate with workers the basis of compensation in a timely manner.

Working Hours

All applicable laws related to overtime and maximum working hour regulations shall be adhered to, considering the well-being of their workers.

Safety, Health & Environmental Stewardship

Business partners shall provide a safe and healthy working environment for their employees and contractors. Additionally the following elements must be included in their safety, health, and environmental programs as based on operational risks:

Contractor Safety

Programs and procedures should be implemented to ensure the health and safety of contractors and subcontractors.

Emergency Planning & Response

Potential emergency situations that could impact the workplace or company shall be identified and preventive measures and training implemented to be prepared to execute emergency plans and response procedures if needed.

Environmental Stewardship

Business partners are expected to operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment and should encourage their suppliers to do the same. To achieve this, our partners shall:

- Quantify their environmental impact of their own operations and in the value chain (e.g., the amount of water used, waste generated, energy consumed, and greenhouse gases (GHG) emitted, impact on biodiversity). This information shall be made available to Organon for review when requested.
- Take reasonable measures to protect nature and reduce their ecological footprint. Implement programs to reduce environmental impact,

including GHG emission reduction, water conservation, reuse and recycling of materials/waste, avoiding the use of hazardous materials where feasible, and reducing the impact on biodiversity.

- Have systems to safely handle, store, recycle, and manage waste, air emissions, and wastewater. Any harmful waste or emissions must be treated before being released into the environment. This includes managing releases of active pharmaceuticals into the environment (PiE).
- Have systems in place to prevent, report, and mitigate accidental spills and releases into the environment.
- Ensure responsible product use by providing clear instructions and warnings to ensure safety and efficacy.
- Manage product end-of-life by implementing proper disposal and recycling practices to minimize environmental impact.
- Promote customer health and safety by ensuring products do not pose risks during use and disposal.
- Engage in environmental services and advocacy to promote sustainable practices and policies and encourage suppliers to do the same.

Facilities and Equipment

Appropriate equipment, facilities, and services should be provided to support worker safety, health, and well-being.

Hazard Information and Training

Safety information relating to hazardous materials – including pharmaceutical compounds and pharmaceutical intermediate materials – shall be made available to be used to educate, train, and protect workers from hazards.

Housing Standards

Business partners that provide housing or living accommodations for workers shall ensure that local housing and safety standards are met.

Process Safety

Risks from chemical and biological processes shall be identified and programs and procedures will be in place to prevent or mitigate catastrophic incidents associated with operations.

Substances of Concern and Producer Responsibility

Substances of concern contained in business partner products shall be identified and disclosed to Organon including their products, components or other materials supplied to Organon and its operating subsidiaries, affiliates and divisions. Business partners will also comply with extended producer responsibility requirements, where regulated in the countries or regions in which those substances are used, and provide requested information to Organon for compliance reporting purposes.

Substances of concern include but are not limited to carcinogens, mutagens and reproductive toxins (CMR), endocrine disruptors (ED), persistent, bioaccumulative, very persistent, very bioaccumulative and toxic materials (PBT/vPvB), phthalates and heavy metals.

Transportation and Shipping

Procedures shall be in place to ensure Organon goods are transported in a compliant manner that will minimize the environmental footprint of all shipping activities. This includes consideration of transportation modes and distances as well as packaging material types and quantities.

Worker Protection

Programs and procedures should be in place to protect workers from overexposure to chemical, biological and/or physical hazards in the workplace.

Management Systems

Business partners shall use management systems to facilitate continual improvement and compliance with the expectations of these Principles:

Auditing

Where required, business partners are expected to cooperate with Organon auditors for Environmental Health & Safety (EHS) audits, Quality, or external third-party auditors, at selected supplier facilities, to verify their compliance with our company's expectations; and by working with them to address identified compliance gaps.

Business Continuity

Business continuity plans shall be developed and implemented for operations supporting Organon business. These plans should be made available to Organon upon request.

Continual Improvement

Business partners are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal and/or external assessments, inspections and management reviews.

Commitment & Accountability

Demonstrate commitment to the Principles described in this document by allocating appropriate resources and creating a culture of responsible business practices.

Documentation

Necessary documentation shall be maintained to demonstrate conformance with these expectations, and compliance with applicable regulations.

Due Diligence

Appropriate due diligence shall be conducted to determine the risks and exposures, prior to entering a business relationship with their own suppliers, to ensure that they can meet our company's expectations. Business partners will inform Organon in a timely manner about risks identified in their supply chains, in case there is an expected impact on Organon.

Effective Communication

Effective systems shall be in place to communicate these Principles to relevant stakeholders including their workers, contractors, and suppliers.

Grievance Mechanisms

Grievance mechanisms shall be accessible to internal and external stakeholders who should be encouraged to use them to report concerns, illegal activities, or breaches of these Principles at work without threat of or actual reprisal, intimidation, or harassment.

Legal Requirements

Business partners shall identify and comply with applicable laws, regulations and standards relating to all locations in which they operate as well as relevant customer requirements.

Regulatory Compliance

All required environmental permits, operating licenses, registrations and authorizations shall be obtained to ensure that business operations, including transportation, adhere to all regulatory operating and reporting requirements.

Response and Remediation

Incidents or concerns relating to these principles, shall be properly investigated and necessary corrective actions and remediation taken where required.

Risk Assessment & Risk Management

Mechanisms shall be in place to assess and manage risks in all areas addressed by this document. Business partners must timely inform Organon about any risks identified in their operations.

Supplier Selection & Monitoring

All applicable laws, regulations and industry standards shall be adhered to when selecting their own partners and suppliers. Business partners will select suppliers that are socially responsible and who share our company's commitment to ethics and integrity. Organon strives to obtain the goods and services we need to further our mission in a way that is lawful, efficient and fair.

Supply Chain Transparency

Wherever possible and when requested, provide, to the extent the commodity value chain allows, traceability of commodity sourcing to the production sites.

Traceability and Control

Systems shall be in place to conduct due diligence on their own supply chain, including traceability for the sources of raw materials to support legal and sustainable sourcing.

Training and Competency

Training that achieves an appropriate level of knowledge, skills, and abilities in management and workers shall be provided to address these Principles.

Ethical Business Practices

Business partners shall conduct their business and operations in an ethical manner including:

Accurate Business Records

Accurate and complete financial books shall be kept. Records of their transactions and payments must fully comply with all applicable laws, accounting principles, tax rules, and regulations.

Animal Welfare

Animals shall be treated with care and minimize pain and stress. Alternatives should be considered including use of fewer animals, and improve procedures to reduce distress. They should also comply with local laws and obtain necessary approvals before conducting studies.

Anti-Bribery and Anti-Corruption Policy

Business partners will act with integrity and shall not engage in any forms of corruption,

including bribery, extortion, and embezzlement. They should not offer, pay, or accept bribes, or engage in corrupt practices to secure unfair advantages. Implement systems to prevent corruption and comply with all applicable laws, including the US Foreign Corrupt Practices Act, the UK Bribery Act, local anti-bribery laws, and OECD standards. Do not tolerate or engage in corruption, whether dealing with government officials or private sector entities. Avoid offering anything of value to influence decisions or gain improper advantages.

Business Ethics

They must not make any false representations or engage in other misleading or deceptive conduct in relation to any company engagement, product, service, or transaction.

Fair Competition

Business shall be conducted consistent with fair and vigorous competition and in compliance with applicable antitrust laws. Partners will employ fair business practices including accurate and truthful advertising.

Clinical Trials

Partners must follow ethical standards and regulations in clinical trials to ensure reliable data on safety and effectiveness. Comply with Good Clinical Practice (GCP) guidelines and ethical principles from the Declaration of Helsinki. Clinical trial business partners must provide full visibility to Organon of any subcontracted clinical trial activities.

Conflict of Interest

Conflicts of interest that could impair their ability to make objective and fair decisions shall be avoided. Disclose any actual conflicts of interest to Organon promptly. Do not

engage in activities, relationships, or financial interests that could compromise their integrity or the integrity of Organon.

Cooperation With Government Agencies

Business partners shall cooperate with investigating government agencies charged with enforcing compliance as and to the extent required by local laws (including, where permitted, by providing reasonable access to facilities and workers). When required, partners will notify the relevant authority if they receive credible information that a worker, contractor or subcontractor has violated local laws.

Economic Sustainability

We seek to build a sustainable supply chain and create a positive economic impact in local communities and around the world. Suppliers are encouraged to help foster social and economic development and contribute to the sustainability of the communities in which they operate.

Gifts, Meals, Entertainment

Gifts, meal or entertainment shall not be provided to a Organon employee, or their family members, in any situation in which it might influence, or appear to influence a business relationship. Gifts and entertainment must be transparent, accurately recorded in their books and records, modest in value, customary to the occasion, related to a legitimate business purpose, and in accordance with all laws and with all policies of the recipient.

Intellectual Property and Confidential Information

Respect and protect intellectual property (IP). Use company IP only as allowed by

agreements and laws. Do not misuse trademarks, copyrighted materials, or disclose confidential information. Report unauthorized use of IP promptly.

Marketing & Promotional Practices

All marketing and promotional materials and activities must conform to high ethical, medical and scientific standards, and comply with all applicable laws and regulations. When engaged with health care professionals, other decision makers or patients, all partners must adhere to relevant industry standards of conduct that apply to them, such as the European Federation of Pharmaceutical Industries & Associations (EFPIA), the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA) and the Pharmaceutical Research and Manufacturers of America (PhRMA), and including without limitation, all other applicable local laws, standards and/or codes of conduct.

Pharmacovigilance

Partners involved in monitoring and assessing the safety and effectiveness of pharmaceutical drugs and medical products after they have been approved and marketed must follow Good Pharmacovigilance Practices (GVP). Partners are responsible for complying with all relevant laws and regulations in their respective jurisdictions.

Privacy and Personal Information Policy

Privacy and personal information shall be protected. Data will be handled responsibly and sensitive information is safeguarded. Ensure data security and comply with all relevant privacy laws, including GDPR.

Product Quality

Business partners involved in the supply, manufacturing, packaging, testing, storage and distribution of materials/products on behalf of Organon will ensure compliance with applicable Quality regulations and Good Manufacturing Practice (GMP) and Good Laboratory Practice (GLP) requirements for the markets in which the products are registered and distributed. Partners will comply with all record retention requirements set by local regulators, as well as those specified in any Quality Agreement with Organon.

Supplier Relationship Management

We aim to create and instill a culture of belonging for our employees and supply chain partners. We work toward this goal by partnering with suppliers that provide competitive, high-quality goods and services and share our goals for women's health and economic prosperity. Suppliers are encouraged to promote equal opportunities in their sourcing process to suppliers from socially and economically different categories.

Trade Compliance

All applicable import and export controls, customs requirements, sanctions and other trade compliance laws of applicable countries must be complied with where transactions occur. They shall conduct restricted party screening to ensure that their business partners do not appear on government watch lists or denied party lists.

Use of Technology, Including AI Policy

Technology shall be used responsibly, including AI, ethically and responsibly. Ensure AI respects human rights, avoids bias,

protects privacy, and complies with applicable laws. Follow internationally recognized principles, such as the Organization for Economic Co-operation and Development (OECD) Principles on Artificial Intelligence.

Communication

Our BPCoC is incorporated in our company standard contracts and agreements, requests for proposals, and purchase order terms and conditions. It is readily accessible and available in multiple languages on our company website.

Monitoring

We monitor partner compliance with our BPCoC through information requests, audits, and other forms of monitoring to ensure that our standards are met. Where specified in contracts or agreements, we reserve the right to conduct audits or investigate business partners' records and facilities. We expect partners to cooperate with information requests or audits initiated by our company, as well as our company requests for certifications and participation in inquiries and investigations.

Consequences of Noncompliance

A violation of the BPCoC may constitute a breach of a partner's agreement(s) with our company and may result in termination of their status as a company business partner, as well as potential legal consequences.

Identification & Reporting of Concerns

Business partners must encourage all workers to report concerns or suspected illegal activities without threat of reprisal, intimidation, or harassment. They are required to investigate and take corrective action if needed. Partners should provide workers with information on how to confidentially report concerns and ensure that reporting workers are protected from retaliation.

If you believe that someone associated with our company or with one of our partners is not meeting a legal requirement, this BPCoC, or has otherwise engaged in improper conduct, you should report it to our company.

- Using our company's Speak Up tool at [Speak Up](https://www.organon.com/integrity) at www.organon.com/integrity that is a confidential channel to raise concerns to our company. It is available 24 hours a day, 7 days a week, and allows for reporting in multiple languages. The Speak Up tool is managed by a third-party vendor.
- When you report a concern using the Speak Up tool, you may remain anonymous, where permitted by law. However, we encourage individuals to identify themselves since doing so will help to facilitate communication.
- By visiting [Speak Up](https://www.organon.com/integrity) at www.organon.com/integrity, individuals can find their local telephone number to dial and speak with a representative who will document the details of the concern. Alternatively, individuals can use the convenient online option if they prefer.

External References

CEO Water Mandate: [CEO Water Mandate | Sign the Commitment to Water Stewardship](#)

Circular Economy: [How to Build a Circular Economy | Ellen MacArthur Foundation](#)

Convention on Biological Diversity: [Home | Convention on Biological Diversity](#)

Corporate Sustainability Reporting: [Corporate sustainability reporting - European Commission](#)

Declaration of Helsinki: [Declaration of Helsinki – WMA – The World Medical Association](#)

International Labour Standards (ILO): [International Labour Standards | International Labour Organization](#)

OECD Guidelines for Multinational Enterprises: [The Organisation for Economic Co-operation and Development | OECD](#)

OECD Guiding Principles for Chemical Accident, Prevention, Preparedness and Response: [Chemical accident prevention, preparedness and response | OECD](#)

Pharmaceutical Supply Chain Initiative (PSCI): [PSCI](#)

Regulation on the registration, evaluation, authorisation and restriction of chemicals (REACH) [REACH Regulation - European Commission](#)

Responsible Care Global Charter: [Responsible Care Global Charter - International Council of Chemical Associations \(ICCA\)](#)

Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS): [RoHS Directive - European Commission](#)

Together for Sustainability: [Home - TFS Initiative](#)

United Nations Global Compact: [Homepage | UN Global Compact](#)

United Nations Guiding Principles: [GuidingPrinciplesBusinessHR_EN.pdf](#)

Universal Declaration on Human Rights: [Universal Declaration of Human Rights | United Nations](#)