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Teva
Supplier Code of
Conduct

Teva Pharmaceutical Industries Ltd (hereinafter “Teva”), maintains high ethical standards for conducting business and does so in accordance with all governmental and industry standards, laws, rules and regulations, as well as Teva’s internal policies. Teva expects the same commitment from suppliers.

Teva has a comprehensive Environmental, Social and Governance (ESG) strategy, which focuses on areas viewed as critical to our business and stakeholders.



Suppliers shall be familiar with Teva's 2030 ESG goals (available through our [ESG website](#)) and support Teva in achieving them.

Our Supplier Code of Conduct specifies the primary principles and expectations Teva requires of suppliers and vendors that have or wish to establish and maintain a business relationship with Teva. It also contains links to policies and positions that apply to Teva suppliers.

In general, all Teva suppliers shall:

- Understand and comply with this Supplier Code of Conduct and policies or positions linked herein.
- Maintain documentation necessary to demonstrate such conformance.
- Immediately report to Teva any gaps in compliance with this Supplier Code of Conduct, any event that affects such compliance or any other events potentially affecting Teva, Teva’s products and/or suppliers' compliance with any applicable Supply Agreements or Quality Technical Agreements with Teva.
- Immediately communicate to Teva any significant inspection or regulatory issue with national or international health authorities.
- Allow Teva or our authorized delegate to conduct necessary audits of facilities, systems and/or documents related to the content of this Supplier Code of Conduct and the policies or positions linked herein.
- Apply the same principles toward third parties with whom suppliers work via their own supplier code of conduct.

- Comply with applicable laws, regulations, rules, ordinances, permits, licenses, approvals, orders, standards, prohibitions, sanctions and Teva requirements in all aspects covered within this Supplier Code of Conduct.
- Comply with the [Principles of the Pharmaceutical Supply Chain Initiative](#) (PSCI), of which Teva is a member.
- Contact a Teva representative with any questions regarding the principles and expectations set forth in this Supplier Code of Conduct via **TevaSupplierCodeofConduct@tevapharm.com**.

Ethics

Suppliers shall conduct their business in an ethical manner and act with integrity. Suppliers shall have adequate Anti-Corruption/Anti-Bribery policies and systems in place and shall not engage in corruption, extortion or embezzlement practices. Further, suppliers shall not pay or accept bribes or participate in any other illegal inducements in business or government relationships, including through third parties or intermediaries and shall employ fair business practices including accurate and truthful advertising. Suppliers will meet the following standards:

- **Avoid conflicts of interest:** Including situations that present – or create the appearance of – a conflict between their interests and their obligations to Teva. Suppliers shall notify Teva immediately, in writing, in the event of a potential or actual conflict of interest.
- **Comply with prohibitions on insider trading and on use of non-public information.**
- **Comply with antitrust and unfair competition laws and regulations**
- **Trade controls or export controls regulations:** Suppliers shall not provide to Teva any materials, products, services, software or technical data that originated or were otherwise sourced, directly or indirectly from:
 - A comprehensively sanctioned country or territory (at present, the Crimea region and Sevastopol, Cuba, Iran, North Korea, Lebanon, and Syria); or
 - From a party (entity or individual) or destination subject to sanctions regimes, or export controls, including but not limited to, those administered by the United Nations, the United States of America, Israel, the United Kingdom, Canada and the European Union whereby the receipt or transfer by Teva would result in a violation of such sanctions regimes or export controls.
- **Maintain effective business controls and accurate reporting, and maintain accurate and complete records in compliance with international accounting principles.**
- **Maintain data integrity for materials and services:** Documentation delivered to Teva should be complete, consistent and accurate.
- Encourage workers and service providers to **report concerns or illegal activities in the workplace** without threat of reprisal, intimidation or harassment, ensuring proper investigation and corrective actions.
- **Ensure humane care and treatment of research animals** abiding by Teva's [Position on Animal Welfare](#).

- Accredited, when applicable, any **laboratory certification** with the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC).
- **Anti-Corruption Regulations:** Comply with Teva's [Prevention of Corruption Policy](#).
- Suppliers who are **Third Party Representatives (TPRs)** will: i.) be subject to Teva Global Compliance **Due Diligence:** (ii.) comply with the standards set forth in Teva's [Third Party Due Diligence Policy](#). Contact a Teva representative to obtain additional information via ThirdPartyProgramGlobal@tevapharm.com or ThirdPartyProgramEU@tevapharm.com.
- **Counterfeit Products:** If the Supplier is offered to purchase or becomes aware of counterfeit, illegally diverted or stolen products in their supply chain that may affect the goods/services the Supplier renders to Teva, the Supplier will notify Teva immediately.
- Suppliers who believe that a Teva employee, or any person or entity acting on behalf of Teva, has engaged in illegal or improper conduct shall report the matter promptly to **Teva's Office of Business Integrity (OBI)**. Confidentially contact a Teva representative at www.tevahotline.ethicspoint.com or via email at Office.BusinessIntegrity@tevapharm.com.
- **Conflict Minerals:** Supplier shall ensure that all parts and products supplied to Teva do not contain "Conflict Minerals," per Teva's [Conflict Minerals Policy](#), including proper remediation if required by Teva. Additionally, if supplying to Teva in the European Union, supplier shall have systems in place that meet the standards outlined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Labor

We conduct our business responsibly, and according to the highest ethical standards, including respect for human rights, both in our own operations and throughout our supply network. Suppliers shall uphold ethical labor practices and procedures. They shall not employ, use, or otherwise benefit from forced, bonded or indentured labor, involuntary prison labor or human trafficking. Suppliers certify the products or services provided to Teva, including the materials incorporated into their products, comply with laws regarding forced labor of the country or countries in which Teva and the supplier have operations. Suppliers shall monitor compliance with these commitments including, but not limited to, reviewing and requiring the same standards from their own supply chain. To this end, suppliers shall communicate their policies regarding forced labor to key stakeholders including, but not limited to, employees, managers, supervisors, other staff with supply chain oversight and their own suppliers, where applicable. Suppliers must meet the following standards:

- **Support and protect internationally recognized human rights** and abide by Teva's [Position on Human Rights](#) including support for the spirit and provisions of the Universal Declaration of Human Rights and subsequent guidance set forth in the United National Guiding Principles on Business and Human Rights.
- Provide a workplace free of harassment, violence, discrimination, punitive and/or inhumane treatment; promote inclusion/diversity; and abide by Teva's [Inclusion and Diversity Position](#).
- **Ensure freely chosen employment and freedom of movement** by not using misleading recruiting practices; allowing employees, contractors and subcontractors access to their identity documents; and allowing workers to leave employment following reasonable notice.
- Abide by the **International Labor Organization's Minimum Age Convention and the International Labor Organization's Worst Forms of Child Labour Convention**.
- **Wages, Benefits and Working Hours:** Communicate the basis of compensation to workers and ensure any supplier-provided housing for workers meets local standards.
- **Ensure Privacy & Protection of Personal Information** and abide by Teva's [Data Privacy Policy](#). In case of breaches, immediately report them to Teva's Global Security Operation Center at gsoc@tevapharm.com, +1 973-265-3702 (global direct) or +1-877-TEVA-757 (US toll free).
 - Collect and keep only legally permitted personal information when there is a legitimate need to do so to carry out their business with Teva.

- Safeguard and ensure lawful, proper use of any confidential information belonging to individuals, companies or other entities with whom they do business, including Teva.
- Have measures to monitor and protect the systems in which confidential information resides, including prevention of both internal and external data/privacy breaches and procedures for responding to such breaches.
- Contractually obligate any third parties with access to the information described in this section to comply with the requirements for protection of such information as set forth in this section.

Health and Safety

The health, safety and well-being of our employees and workers throughout our supply network is critical to our ability to supply medicines to patients. Suppliers shall abide by Teva's [Position on Occupational Health and Safety](#) and conduct activities with adequate regard for the safety and health of their employees and the general public. This includes ensuring appropriate housekeeping and providing workers access to potable water. Suppliers shall provide a safe and healthy working environment, including, where applicable, for any company-provided living quarters. Suppliers are encouraged to implement programs that positively affect the health of their employees.

- **Protect workers** from exposure to hazards and unreasonably physically demanding tasks and ensure that proper personal protective equipment and work is according to all applicable laws, regulations and other requirements.
- Have **process safety** programs, identifying, monitoring and preventing/controlling exposure to hazards, and ensuring response to hazardous chemical or biological releases, if applicable.
- **Emergency Preparedness and Response** by scenario planning, implementing, and maintaining emergency plans and response procedures.
- **Make hazard information available**, including for pharmaceutical compounds and materials, ensuring compliance and proper monitoring through documents such as Safety Data Sheets (SDS).

Environment

With a growing list of issues affecting our planet, Teva believes we have a responsibility to lessen our impact on the environment including through our supply network. Suppliers shall operate in an environmentally responsible manner to minimize adverse environmental impacts, abiding by Teva's [Environmental Sustainability Position](#). Suppliers are encouraged to conserve natural resources, avoid using hazardous materials, and reduce, reuse and recycle. Supplier shall abide by Teva's [Antimicrobial Resistance Position](#), and provide information as needed to support Teva's goal of minimizing anti-microbial discharge to the environment (Pharmaceuticals in the Environment - PiE).

Suppliers shall support Teva's 2030 environmental goals, which include reducing Scope 1 and 2 greenhouse (GHG) emissions, improving transparency of Scope 3 GHG emissions and meeting AMR Industry Alliance commitments.

- **Obtain/maintain and comply with** all required environmental authorizations, permits, and licenses. Comply with information registration requirements and restrictions.
- Establish **waste and emissions** systems to ensure safe handling, movement, and storage/disposal of all wastes, including assessment, management, control and treatment for any waste, wastewater or emissions, with potential adverse impacts on humans or the environment.
- Conduct due diligence on source of key raw materials to promote legal and sustainable sourcing; label and/or communicate any **restricted substances regulated** under various regulatory schemes (e.g. EU REACH) for recycling and disposal; respond to requests for substance composition in materials/parts; verify plants/forests materials are legally harvested and, imported/exported.
- **Make reasonable efforts toward transparency and public disclosure** of ESG and environment-related data and goals, including responding to requests for participation in disclosure programs (e.g., CDP questionnaires on climate/water security).

Management Systems

Teva values transparency and is committed to continuous improvement of business practices both in our own operations and throughout our supply network. Suppliers shall have management systems and processes in place to facilitate continuous improvement, business continuity and compliance with all the principles outlined in this document.

- Establish **risk management** systems to determine and control risks in all areas addressed in this document, including business continuity and risk management plans to facilitate continuity of operations.
- Create **training programs** that allow management and workers to document and improve understanding and adherence to the global principles, guidelines and regulations established in this document.
- **Maintain open and direct communication** with appropriate Teva business functions, and establish effective systems to communicate the principles outlined in this document to workers, contractors, and their own suppliers.
- **Continually improve** adherence by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.