

Code of Conduct for  
**HANDOK**  
Business Partners



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# Part 1. Preface

## 1. Purpose

Code of Conduct for HANDOK Business Partners (hereinafter, referred to as the ‘Code of Conduct’) sets out the high ethical standards and specific compliance principles that HANDOK expects of its Business Partners, based on the values and principles described in the HANDOK Code of Conduct.

## 2. Scope

HANDOK business partners subject to this Code of Conduct (hereinafter, referred to as ‘Partner’) include suppliers, distributors, business partners and other parties that have, or intend to establish, a business relationship with HANDOK. Partners shall implement the principles set out in this Code of Conduct within their organizations, communicate them to their members, and ensure compliance when working with HANDOK.

## 3. Composition

This Code of Conduct consists of the following five areas and sets out the basic principles for each area. If there is any uncertainty in applying these principles to specific business situations, please contact the relevant department at HANDOK.

- (1) Ethics and Compliance
- (2) Human Rights and Labor
- (3) Environment, Health and Safety
- (4) Quality
- (5) Management System

## 4. Glossary

- Biodiversity: The variety of all living organisms, including intra-species diversity, inter-species diversity, and ecosystem diversity.
- Bribery: The provision, acceptance, or demand of anything of value to influence the actions of an individual who has an official or legal duty.
- Corruption: The abuse of entrusted power for private gain or illegal benefit.
- Culture: A combination of organizational attitudes, values, and beliefs that influences the way an organization operates or responds.

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- Donor: A person who donates tissues, cells, organs, or other body parts for research purposes.
- Due Diligence: An investigation and analysis of a company or organization for the purpose of reviewing a business transaction or operation.
- Internal Stakeholder: An individual who works for or has ownership in a company.
- External Stakeholder: An individual or organization outside the company that has an interest in the company's activities (e.g., customers, suppliers, investors, local communities, etc.).
- Greenhouse Gas (GHG) Emissions: Emissions of the six greenhouse gases (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>) covered under the UN Framework Convention on Climate Change.
- Human Rights: Rights as defined in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs), including the Universal Declaration of Human Rights and ILO Fundamental Principles and Rights at Work.
- Local Community: People who reside or work in and around the areas where a company operates and conducts its activities.

## 5. Reporting and Whistleblowing Channel

In the course of business transactions and work with HANDOK, if Partners become aware of any violations or potential violations related to ethics, compliance, or fair trade, they must promptly report such matters to HANDOK. To this end, HANDOK operates the 'HANDOK Transparency Management Center,' an anonymous reporting channel accessible to all external stakeholders, including Partners.

Partners may report either anonymously or under their real names. All reports received are investigated according to independent and objective procedures. Measures based on investigation results are taken fairly and strictly in accordance with the facts, applicable laws, and HANDOK's internal regulations.

HANDOK thoroughly protects the identity and rights of reporting persons. HANDOK sincerely reviews all credible reports raised in good faith by Partners without fear of retaliation or disadvantage and takes appropriate actions. Partners shall actively utilize this reporting channel as part of their practice of ethical and compliance management.

- Go to HANDOK Transparency Management Center :  
<https://www.handok.co.kr/en/etc/center#page-content>

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## 6. Application

This Code of Conduct may be continuously reviewed and updated and the latest version can be viewed on the HANDOK website.

(<https://www.handok.co.kr/en/page/ethics2#page-content>)

If any provision of this Code of Conduct conflicts with, or is ambiguous in relation to, the terms of an agreement with a Partner, the relevant contractual provisions shall prevail.

# Part 2. Code of Conduct

## 1. Ethics and Compliance

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HANDOK expects its Partners to conduct business in accordance with high ethical standards and to ensure that the Partners' employees understand and comply with the principles and regulations on the ethical business practices of HANDOK when they work with HANDOK.

### (1) Prohibition of Bribery and Prevention of Corruption

HANDOK does not tolerate corruption or bribery in any form.

Partners doing business with HANDOK must comply with all laws related to the prevention of corruption including the following :

- Act on the Prohibition of Improper Solicitation and the Provision/Receipt of Money and Valuables
- U.S. Foreign Corrupt Practices Act
- UK Bribery Act

Partners shall not directly or indirectly provide, offer, or accept money or valuables in order to influence the performance of work or to obtain or maintain business from HANDOK or a third party. This includes all types of incentives such as all benefits for HANDOK's executives and employees, fees, commissions, dividends, gifts, cash, services, rewards, and the like.

In addition, Partners shall ensure that the principles of anti-bribery and anti-corruption apply equally to their subsidiaries, agents, subcontractors, brokers, and employees.

### (2) Fair Trade

Partners shall observe laws related to fair trade and conduct business in accordance with antitrust laws and fair business practices.

### (3) Money, Gifts and Entertainment

HANDOK and HANDOK's executives and employees are prohibited from receiving money or valuables, gifts, hospitality, or entertainment from external stakeholders. This is because such offerings may influence business decisions and may be interpreted as a conflict of interest.

However, it may be allowed only for the following cases.

- Gifts such as souvenirs, transportation, lodging, or meals provided uniformly to all participants at official events related to business dealings
- Souvenirs or promotional goods to be distributed to an unspecified number of people
- Food or gifts within KRW 100,000 consistent with customary practices during traditional holidays such as Seol (Lunar New Year) and Chuseok

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- Congratulatory and condolence monetary gifts or gifts of KRW 100,000 or less for congratulatory or condolence family events
- Food and beverages within KRW 50,000 per person provided unavoidably in the course of business activities

However, even the cases above that are limitedly permitted shall be prohibited if there is a possibility that they would be recognized as inappropriate behavior according to conventional social norms—such as before, during, or immediately after purchase, contracting, auditing, assessment, etc. In such cases, all provision of money, valuables, gifts, and hospitality is prohibited.

### **(4) Conflict of Interest Management**

Partners shall take reasonable measures to prevent and manage conflicts of interest. If an actual or potential conflict of interest arises in connection with business dealings with HANDOK, it must be disclosed to HANDOK.

### **(5) Privacy and Data Protection**

HANDOK expects that its Partners protect personal information and confidential information.

Partners shall adopt and maintain processes to provide reasonable protection for personal, proprietary, and confidential information, including information received, accessed, or processed on behalf of HANDOK.

Partners shall be aware that any unauthorized use or disposal of information may cause personal, legal, reputational, and financial losses to themselves or HANDOK.

Partners shall observe all applicable laws related to personal information protection, data protection, and information security.

### **(6) Ethical Use of Artificial Intelligence (AI)**

When utilizing artificial intelligence technologies, Partners shall comply with applicable laws and, based on human-centered values, consider the values of human rights protection, privacy protection, and respect for diversity in order to minimize bias and discrimination. In addition, Partners shall ensure transparency and accountability in the use of AI and shall establish procedures to verify the accuracy and safety of information generated by AI.

### **(7) Intellectual Property Rights**

Partners shall protect the intellectual property rights and confidential information of HANDOK and its subsidiaries. Furthermore, Partners shall respect and endeavor to protect the intellectual property rights of third parties, including other partners and competitors, in connection with business activities.

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Partners shall not use the names or trademarks of HANDOK or HANDOK's subsidiaries in advertisements or promotional materials for their products without the prior written consent of HANDOK.

### **(8) Accurate Record Management**

All transactions with HANDOK, or all business transactions and expenses incurred on behalf of HANDOK, shall be recorded accurately, completely, and reliably. All records shall be maintained in a timely manner and with reasonable detail in accordance with applicable accounting principles, laws, and regulations.

### **(9) Animal Welfare**

Where Partners use animals in research, testing, manufacturing, or other business activities, they shall comply with applicable laws and regulations. Partners shall apply the 3Rs principles—Replace, Reduce, and Refine—and, where scientifically valid and regulatory-approved alternatives exist, prioritize their use. When the use of animals is unavoidable, Partners shall minimize the number of animals used and manage them humanely to reduce suffering during handling and experimentation.

### **(10) Patient Safety and Access to Information**

Partners shall operate an adequate management system to ensure that the rights to health and access to information of patients, clinical trial subjects, and research donors are not infringed.

## **2. Human Rights and Labor**

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Partners shall respect and protect the human rights of their employees, shall not engage in any unfair discrimination, and shall comply with labor-related laws such as the Labor Standards Act and the Gender Equality Employment Act.

Furthermore, in consideration of HANDOK's human rights management implementation policy, Partners shall conduct business activities in a manner consistent with the principles of international standards on human rights and labor—including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights (UNGPs), the ILO Core Conventions, and the OECD Due Diligence Guidance for Responsible Business Conduct—and shall make efforts to proactively identify, prevent, and mitigate any human rights and labor-related risks that may arise in the course of their business activities.

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### **(1) Freely Chosen Employment**

Partners shall ensure that all labor is freely chosen and that their employees are not subjected to forced labor through mental or physical restraint.

### **(2) Prohibition of Child Labor**

Partners shall not use child labor in any businesses and facilities, and all workers shall be over the legal employment age.

### **(3) Respect for Diversity and Prohibition of Discrimination**

Partners shall treat their employees' diversity as a valuable asset and provide an inclusive and non-discriminatory working environment so that different ideas, perspectives, and beliefs can be respected. In hiring, any discrimination based on race, gender, age, religion, marital status, or other factors shall not be tolerated, and it shall be assured that no unfair discrimination exists in employment and labor conditions.

### **(4) Humane Treatment**

Partners shall provide a working environment free from harassment, inhumane treatment, physical or mental coercion, or verbal abuse. Any form of improper treatment—including sexual harassment, abuse, or corporal punishment—shall not be tolerated.

### **(5) Wages, Benefits and Working Hours**

Partners shall provide appropriate compensation, including minimum wages, overtime pay, and statutory benefits, in accordance with applicable laws and employment contracts. In addition, working hours shall be managed so as not to exceed the limits set by applicable laws.

### **(6) Freedom of Association and Right to Collective Bargaining**

Partners shall respect, in accordance with applicable laws, workers' freedom of association, the right to join or not to join a labor union, and the right to collective bargaining.

### **(7) Respect for Local Communities**

Partners shall respect the rights of the local communities where their business sites are located and shall make efforts to minimize negative impacts on local communities, including the right to a clean and healthy environment.

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### 3. Environment, Health and Safety

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HANDOK expects that its Partners have a sense of responsibility for the environment, operate in a manner that uses resources efficiently, maintain and manage safe business sites, and do their best to guarantee their employees' right to work in a healthy manner.

In addition, Partners shall observe all applicable laws related to environmental protection, safety, and health.

#### (1) Environmental Permits

Partners shall ensure that they observe all applicable laws and industry guidelines related to environmental protection, obtain all required environmental permits, licenses, and information registrations, and comply with applicable work and reporting requirements.

#### (2) Waste and Discharge Management

Partners shall properly manage, control, and treat all waste, wastewater, and discharges that may have a negative impact on human health or the environment before they are released into the natural environment. In particular, where pharmaceutical active ingredients are discharged into the environment (Pharmaceuticals in the Environment, PiE), strict management and control must be maintained.

#### (3) Climate Change Response

Partners shall recognize the impact of climate change on the environment and society, and shall monitor and endeavor to reduce greenhouse gas (GHG) emissions generated in the course of business operations. In addition, Partners shall encourage efforts to address climate change across their supply chains.

#### (4) Resource Efficiency

Partners shall endeavor to reduce waste generation by considering resource circularity and shall minimize resource consumption by improving the efficiency of resource use, including water.

In addition, where possible, Partners shall consider the use of renewable and sustainable resources and take measures to expand reuse and recycling.

#### (5) Biodiversity Conservation

Partners shall understand the impact of their business activities on biodiversity and, where possible, shall reduce and mitigate the biodiversity impacts and environmental footprints resulting from their business activities.

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### **(6) Spills and Discharge Management**

Partners shall have effective management systems in place to prevent and mitigate accidental environmental spills and discharges, and shall minimize any negative impacts on the environment and local communities resulting therefrom.

### **(7) Work Environment Safety**

Partners shall conduct appropriate hazard assessments and prepare emergency response plans to ensure the safety of the work environment. Partners shall provide education and training on hazardous substances to their employees and provide safety information to protect them from hazardous substances. This includes safety information on hazardous substances used in chemical substances, pharmaceutical compounds, and pharmaceutical intermediates. In addition, Partners shall diligently carry out basic workplace management and strive to establish a culture that prioritizes safety.

### **(8) Workers' Health and Protection**

Partners shall protect their employees so that they are not overexposed to chemical, biological, and physical hazards at business sites, and shall protect them against hazards related to the infrastructure facilities used by employees.

### **(9) Safe Handling and Process Safety**

Partners shall identify hazards that may arise from chemical and biological processes and shall have management systems in place to prevent or mitigate the discharge of chemical substances. Partners shall comply with applicable laws and regulations.

## **4. Quality**

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Partners are expected to comply with applicable laws and regulations and provide high-quality safe and effective products and services.

### **(1) Quality/ Delivery Execution**

Partners shall ensure timely delivery in accordance with HANDOK's requirements or contractual terms.

Partners shall maintain systems to monitor product quality and performance, demonstrate continuous improvement by tracking internal defects, customer complaints, and reductions in defective shipments, and respond in a timely manner to any complaints raised by HANDOK.

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## **(2) Quality System**

Partners shall maintain quality systems and product registration processes to ensure that their products comply with all applicable regulations in the countries where such products are manufactured and/or distributed.

## **(3) Product Protection**

Partners shall have management and security systems in place to prevent products and raw materials from being tampered with, counterfeited, or illegally distributed.

## **5. Management System**

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Partners shall operate appropriate management systems—including review of risks and impacts, regulatory monitoring, allocation of responsibilities, risk mitigation measures, and continuous improvement—in order to ensure compliance with all applicable laws and this Code of Conduct.

### **(1) Building a Compliance Culture and Responsible Management**

Partners shall build a culture of compliance with this Code of Conduct so that the organization's attitudes, values, and beliefs are reflected in day-to-day decision-making and work practices, and shall practice responsible management.

To this end, the management of Partners shall clearly declare its commitment to comply with this Code of Conduct, allocate appropriate resources, and designate responsible personnel so that the requirements of this Code of Conduct are understood and implemented on a company-wide basis.

### **(2) Risk Assessment and Management**

Partners shall have processes in place to identify and manage risks in all areas mentioned in this Code of Conduct. In addition, Partners shall establish procedures to appropriately manage risks that may arise from changes in the business environment or operating methods.

### **(3) Legal and Customer Requirements**

Partners shall have processes in place to understand, monitor, and handle applicable laws, regulations, and customer requirements.

### **(4) Supply Chain Management**

Partners shall have appropriate management systems in place to enable management of and due diligence on their own supply chains, including the sources of raw materials, in order to support lawful and sustainable sourcing.

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### **(5) Documentation and Records**

Partners shall create and manage documents and records that demonstrate compliance with applicable laws and the requirements of this Code of Conduct.

### **(6) Education and Communication**

Partners shall operate educational programs to meet the requirements of this Code of Conduct. In addition, Partners shall have a system in place to effectively communicate these principles to relevant stakeholders, including workers, contractors, suppliers, and local communities.

### **(7) Continuous Improvement**

Partners shall continuously improve the internal control environment by executing proper corrective actions for deficiencies identified in internal or external evaluations, audits, or monitoring.

### **(8) Grievance Handling and Internal Reporting**

Partners shall have accessible grievance handling and internal reporting processes in place so that their employees and external stakeholders can raise concerns related to ethics, human rights and labor, environment, health and safety, and quality. The internal reporting process shall be clearly understood by employees and shall guarantee protection for reporting persons and the prevention of disadvantage.

### **(9) Emergency Preparedness and Response**

Partners shall have effective emergency response plans and procedures in place to prepare for emergency situations.

### **(10) Incident Response and Remediation**

Partners shall adequately investigate incidents that have occurred or concerns that have been raised in relation to this Code of Conduct and shall execute necessary corrective actions for confirmed issues. In addition, where necessary, Partners shall provide appropriate measures for the remediation of harm or the prevention of recurrence.

# Revision History

## Revision History

No.	Document Name	Enactment/Revision Date	Reasons for Revision
REV.01	Code of Conduct for HANDOK Business Partners	July 1, 2021	First enactment
REV.02	Code of Conduct for HANDOK Business Partners	June 1, 2026	First revision

The Health Innovator  **HANDOK**

## **Code of Conduct for HANDOK Business partners**

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