

Handbook for Orion Pharma's Third Party Code of Conduct



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Introduction

Compliance and sustainability are at the heart of everything we do at Orion Pharma. We expect the same commitment from our business partners. This handbook outlines our expectations and helps you understand how we work together to conduct business responsibly, respect people and the planet, and uphold the highest standards of integrity. This handbook goes through the key principles, and tells you:

- Why the expectations matter
- What the expectations are
- Where to find additional information and support

We will start by exploring how to build a strong foundation and then look at what this means in practice for Ethics, Human Rights, Health and Safety, and the Environment.

Building the Foundation



Governance and Management Systems



Grievance mechanisms

Focus on What Matters Most



Ethics



Human Rights



Health and safety



Environment



Look out for the light bulb icons throughout this handbook. They will provide you with additional explanations and practical examples.

Please note that this document is for guidance purposes only. It is not legally binding and does not replace or form part of the official Third Party Code of Conduct.

Powered by industry best practices: the PSCI Principles

Orion's Third Party Code of Conduct is based on the Pharmaceutical Supply Chain Initiative (PSCI) Principles, with additional requirements relating to trade sanctions, the UK Bribery Act and the US Foreign Corrupt Practices Act (FCPA). As a PSCI member, we are part of a global collaboration of pharmaceutical and healthcare companies working together to raise standards across our industry. The PSCI Principles set a shared foundation for responsible supply chain management.

PSCI offers also more information on how you can assess your maturity against the principal requirements: [The Principles – PSCI](#). We will also link to PSCI's Learning platform Learnster in this document so you can gain more knowledge, if you are a part of the community. Find more information on PSCI Learnster login practices here: [PSCI training now accessible on e-learning platform Learnster – PSCI](#).



Governance and Management Systems

WHY THIS MATTERS

Strong governance and effective management are the foundation of responsible and sustainable business. They help you make informed decisions, ensure accountability, and support compliance with applicable laws and recognised standards, such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

A structured approach to governance and management helps you both know and show how you are managing risks and improving performance. These practices should be embedded in your daily operations, with clear roles and responsibilities across the organisation. Set objectives, conduct risk-based assessments, and implement controls and monitoring activities that reflect your risks. Regular training helps ensure that employees understand their responsibilities and can contribute to continuous improvement.

WHAT WE EXPECT FROM YOU

- **Management systems to conduct due diligence for ethics, compliance, human rights, health and safety and the environment:** Know your risks and impacts, monitor legislation, prioritise your most material issues, assign responsibilities, adopt risk-mitigation measures, and facilitate continual improvement and compliance. Conduct due diligence also throughout your value chain. Set performance objectives and implement action plans. Address any problems you find in audits or checks. Learn also from near misses. Keep clear records to show what actions you have taken to meet your responsibilities.

Due diligence in a nutshell

Due diligence is used across businesses in different contexts, such as:

- Financial due diligence in M&A, valuation and financial risks
- Compliance due diligence in anti-corruption, sanctions, and legal risks
- Sustainability due diligence in human rights, environment, and supply chains

At its heart, due diligence is the same everywhere: it is an *ongoing process to identify risks, take action to prevent or mitigate harm, and account for how those impacts are addressed*. In short: *due diligence is not a one-time check – it is a continuous, risk-based process to manage impacts responsibly across business activities and relationships*.

For sustainability, due diligence has been formalized in the UN Guiding Principles on Business and Human Rights (UNGP's) and the OECD Guidelines for Multinational Enterprises.



We know that our business partners operate in different contexts and vary in size. We expect you to apply the requirement above in way that fits your organisation, activities, scale, and operating context. What matters is that, together, we work towards the same goals: managing risks effectively, complying with laws, and promoting responsible business practices.

- **Leadership from the top:** Make sure that due diligence is understood and overseen by your top management.
- **A culture of responsible business practices through trainings:** Support and maintain a culture that promotes responsible, ethical, and compliant behaviours across the organisation. This can be done through e.g. training programmes that ensure your management and workers have the necessary knowledge, skills, and capabilities to carry out due diligence.
- **Compliance with laws and regulations:** Ensure full compliance with applicable national laws as well as international laws and regulations. If your local laws conflict with this Third Party Code of Conduct, follow the law and inform Orion Pharma as soon as possible so that we can work together to find an alternative way to achieve the intent of this Code.
- **Alignment with recognised standards:** Where relevant, identify and comply with recognised standards, generally accepted management systems, and customer requirements applicable to your business.



These could include, for example, the ISO standards, Corporate Governance Codes for listed companies, or for a pharmaceutical company the GxP standards.

- **Share the message:** Ensure that your business partners, such as suppliers and contractors, are aware of these principles and encourage them to build their own due diligence systems.



Responsibility does not stop with your direct suppliers. Sustainability and compliance risks can occur at any level of the supply chain. This is why we expect you to pass on the same principles to your own suppliers and business partners and to ensure they understand and follow them.

FIND OUT MORE

- Have a look at how OECD guides you in building a robust due diligence management system: [OECD Due Diligence Guidance for Responsible Business Conduct \(EN\)](#).
- **Course on PSCI Learnster:** Read more on how to ensure Business continuity on PSCI's course at [Learnster U](#). Please note that you must be either a PSCI member or a supplier to a PSCI member to access the courses.
- **Course on PSCI Learnster:** In this course you will learn the basics of building a strong governance system for culture, commitment, and accountability: [Culture, Commitment, and Accountability](#). Please note that you must be either a PSCI member or a supplier to a PSCI member to access the courses.



Grievance mechanisms

WHY THIS MATTERS

A functioning grievance mechanism gives your stakeholders, such as your employees, local communities, non-governmental organisations, and suppliers, a safe way to raise concerns. It ensures their concerns and questions are heard, taken seriously, and addressed. Stakeholders should be encouraged to use it to report issues such as unethical behaviour, human rights concerns, environmental impacts, or health and safety risks.

When concerns are properly handled and resolved, it helps build trust, improve morale, and strengthen long term commitment. The UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises also expect you to establish grievance processes.

WHAT WE EXPECT FROM YOU

- **A grievance channel** that is accessible to internal and external stakeholders.
- **A grievance policy** that is transparent and understandable.
- **Protection from any form of retaliation**, including threats, intimidation, harassment, or other negative consequences for anyone who raises a concern in good faith or participates in an investigation.
- **Investigation of reported incidents** or concerns and taking necessary corrective actions and providing remediation where required.
- **Recording of received complaints** while protecting the identity and anonymity of the person raising the concern.

Grievance terminology

A grievance is a concern or complaint raised by an individual or group (e.g. workers, contractors, communities, or civil society organisations) related to your company's operations or business relationships.

A grievance channel is the entry point used to submit a grievance. Make sure it is accessible to your stakeholders, be it a phone number, a social media channel, an e-mail address, an online reporting tool or an externally hosted whistleblowing service – or a combination of many.

A grievance mechanism is the process you establish to receive, assess, investigate and resolve such concerns.



We know that our business partners operate in different contexts and vary in size. We expect you to apply the requirement above in a way that complies with applicable regulations and is appropriate for your organisation, activities, scale, and operating context.

FIND OUT MORE

- Refer to The Fair Labor Association's (FLA) practical guide for companies on how to set up and run effective grievance mechanisms: [Grievance Mechanism Toolkit for Companies – Fair Labor Association](#)
- See UN Global Compact's tips for creating a well-functioning grievance mechanism: [Grievance Mechanisms for Business and Human Rights | UN Global Compact](#)
- For compliance requirements within the European Union, please refer to the Whistleblower Protection Directive at the European Union's [website](#)
- Orion Pharma also has its own grievance mechanism. Have a look at our [Compliance Line](#).



Ethics

WHY THIS MATTERS

Because Orion Pharma's work directly affects human health, operating responsibly and maintaining trust are essential in the highly regulated environment in which we operate. This makes integrity, transparency, and responsible conduct essential across our entire value chain and our suppliers we work with. Failures in these areas can harm people, violate fundamental rights, and lead to serious regulatory breaches.

For Orion Pharma, this is not only an ethical responsibility; it is fundamental to our business. It can affect our licence to operate and the trust that patients, customers, and society place in our medicines and products. This is why we expect you to uphold the same standards and work with us responsibly, regardless of your sector or line of business.

WHAT WE EXPECT FROM YOU

- **Integrity and anti-corruption:** All forms of corruption are strictly prohibited. Corruption can be, for example, bribery, extortion, and embezzlement. You must make sure that neither your employees, suppliers, intermediaries nor anyone else acting on your behalf offers, gives, or accepts bribes or improper payments. This includes payments made to win or keep business or to gain an unfair advantage. You must have systems in place to prevent corruption and comply with applicable laws, including but not limited to the US Foreign Corrupt Practices Act and the UK Bribery Act, in the jurisdictions where you operate.



Why do we require our business partners to comply with the [US Foreign Corrupt Practices Act](#) (FCPA) and the [UK Bribery Act](#)? These laws have extraterritorial reach and are widely recognised as global anti-corruption standards. Orion Pharma is not asking you to become subject to US or UK law as a matter of local law. Rather, we require all of our business partners to comply with anti-corruption standards that are reflected in the US FCPA and the UK Bribery Act, regardless of their location. Please note: Because Orion Pharma applies a zero-tolerance approach to corruption, this section sets more detailed requirements than the PSCI principles.

- **No gifts or hospitality to influence decisions:** You must not offer, give, or accept gifts, hospitality, or anything of value if it could influence a business decision or create an unfair advantage for you, Orion Pharma, or anyone else. This includes any kinds of gifts, such as cash, discounts, commissions, services, and other benefits. At Orion Pharma, we believe that our business partners understand the importance of maintaining a professional relationship based on mutual respect and trust. Therefore, we kindly request that our existing and potential business

partners refrain from offering gifts to our employees (or their family members or close contacts) during business meetings, other events or in connection with other relationship management. Any gifts or hospitality you provide should be modest, occasional, and appropriate for normal business relationships and always follow the law. Cash or cash-like gifts (such as open-loop gift cards) are always prohibited.

- **Following trade sanctions and export law:** Ensure compliance with all applicable import and export control laws and regulations, including, but not limited to, international trade sanctions issued by the UN, EU, UK, or US authorities. If requested by Orion Pharma, you must provide information about where your products are manufactured. You must also inform Orion Pharma without undue delay if:
 - you become aware of any breaches of trade sanctions or restrictions relevant to your business relationship with Orion Pharma, you, your Group company or your sub-contractor becomes subject to any investigation related to sanctions compliance, where this information may lawfully be shared with Orion Pharma, or
 - there are export controls or licence requirements that apply to the products, software, or technology you supply to Orion Pharma.
 - **Fair competition:** Conduct your business consistently with fair competition and in compliance with all applicable anti-trust laws. Never take any part in activities that might restrict or make it harder for companies to compete fairly. Employ fair business practices including accurate and truthful advertising.
 - **Ensuring data privacy and security:** Safeguard and make only proper use of confidential information to ensure that company, worker, patient, subject, and donor privacy rights are protected. Comply with applicable privacy and data protection laws and ensure the protection, security, and lawful use of personal data.
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- Cybersecurity is highly important to Orion Pharma. We expect you to take appropriate steps to protect information, systems, and operations from unauthorized access, loss, misuse, cyber threats, and other security risks. Additional security requirements vary depending on the services you provide. Please refer to your contract with Orion Pharma for details.
- **Avoidance and management of conflict of interest:** Identify, avoid, and manage situations where personal interests could affect your decisions. Do not interact with Orion Pharma employees in ways that could influence, or appear to influence, their ability to act in Orion Pharma's best interest. Always tell Orion Pharma about any real or potential conflicts of interest.
 - **Product protection and quality:** Have management and security systems to protect products, components, and ingredients from the risks of adulteration, falsification, or theft for the purpose of illegal resale.

Additional requirement if you are working in pharma:

- **Patient safety and access to information:** Have management systems in place to minimize the risk of adversely impacting on the rights of stakeholders, e.g. patients, subjects, and donors, including their rights to health and to access information directly.

Additional requirement if you are working with animals:

- **Animal welfare:** Animals shall be treated respectfully, minimizing pain and stress. Animal testing should only be performed after consideration to replace animals, to reduce the numbers of animals used, or to refine procedures to minimize distress. Alternatives should be used wherever these are scientifically valid and acceptable to regulatory authorities.

FIND OUT MORE

- The [OECD Business Integrity webpage](#) focuses on how integrity, ethics, and anti corruption measures are essential for well-functioning markets and responsible business conduct with leadership accountability and compliance systems, and the broader economic and societal benefits of integrity.
- **Course on PSCI Learnster:** New to fair competition? This Learnster course will guide you through the essentials: [Fair Competition](#). Please note that you must be either a PSCI member or a supplier to a PSCI member to access the courses.



Human Rights

WHY THIS MATTERS

Did you know that respecting human rights is a responsibility of every business, regardless of its size or industry? This is not just about avoiding harm. It means actively having systems in place to identify, prevent, reduce, and address potential impacts across your operations and value chains.

Every business affects people. Your actions influence your own employees and those in your supply chain through working hours, fair pay, and safe conditions. Your products and services can affect customers and patients through their safety, quality, and accessibility. Even communities near your sites or transport routes can be impacted through environmental effects and health and safety risks.

For Orion Pharma, respecting human rights is not optional. It is essential to protecting people, maintaining trust, and ensuring long-term business success. That is why we expect all our suppliers to take this responsibility seriously and work with us to prevent harm and drive positive impact.

WHAT WE EXPECT FROM YOU

- **Follow the UNGPs:** Commit to and respect human rights as outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs). In the UNGPs, human rights are defined, at a minimum, as the rights expressed in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Why are the UNGPs so important?

The UN Guiding Principles on Business and Human Rights (UNGPs) are fundamental because they established, for the first time, a clear division of roles and responsibilities between states, companies, and individuals. While states have a duty to protect human rights, companies have a responsibility to respect them.

The UNGPs are not just high-level principles. They require companies to implement concrete processes to identify, prevent, mitigate, and account for how they address their human rights impacts. The *OECD Guidelines for Multinational Enterprises* are explicitly aligned with, and build upon, the UNGPs' due diligence framework, extending this approach to also cover environmental and governance aspects.



We know that our business partners operate in different contexts and vary in size. We expect you to apply the requirement above in way that fits your organisation, activities, scale, and operating context.



Find practical guidance on implementing the UNGPs from the Business & Human Rights Resource Centre: [UNGPs Guidance & Implementation – Business and Human Rights Centre](#)

- **Freely chosen employment:** Ensure you don't have forced, bonded, or indentured labour, involuntary prison labour, or take part in human trafficking or any form of modern slavery in your own business or in your supply chains. Ensure also that no worker shall pay for a job or be denied freedom of movement by e.g. withholding of passports or other personal IDs.



Did you know that over 26 million people are estimated to be in forced labour worldwide? Explore ILO's eleven indicators of forced labour here: [ILO indicators of forced labour – 2025 revised edition](#)

- **No child labour and awareness of young workers:** You must not employ child labour under any circumstances. This means you must not hire anyone below the minimum legal working age in the country of operation, or below the age for completing compulsory education, whichever is higher. You must take appropriate measures to verify the age of all workers and prevent child labour in your operations and supply chains. The employment of workers under 18 years of age ("young workers") is only permitted where it is lawful and does not expose them to work that is hazardous, harmful to their health or development, or interferes with their education. You must ensure that appropriate protections, supervision, and working conditions are in place for young workers.



Have a look at ILO's website for more information on Child Labour: www.ilo.org/topics-and-sectors/child-labour

- **Non-discrimination:** Strive for equality. Provide a work environment free from discrimination for reasons such as race, colour, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, marital status, or any other discriminating factor.
- **Fair treatment:** Provide a work environment free of harassment, harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers, and of threat of any such treatment.
- **Fair wages, benefits, and working hours:** Pay workers according to applicable wage laws and employment contracts, including minimum wages, overtime hours, and mandated benefits required by local laws. Communicate with the worker the basis on which they are being compensated in a timely manner. Overtime work shall be voluntary, as well as consistent with applicable national and international standards. Communicate with the workers whether overtime is required and the wages to be paid for such overtime.



Did you know that the ILO promotes a reduction of working hours towards a 40-hour work week? Learn more: [Working time and work organization | International Labour Organization](#)



Did you know that there is a difference between minimum wage and a living wage? While we here only request minimum wages set by law, we strongly recommended to strive for living wage, as it is intended to provide workers and their families a decent standard of living and the ability to meet their basic needs: [Living wages | International Labour Organization](#)

- **Freedom of association and right to collective bargaining:** Open communication and direct engagement with workers to resolve workplace and compensation issues are encouraged. 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, as well as to bargain collectively. If the law does not allow workers to form unions or bargain together, the employer should still support other ways for workers to organize and speak collectively. The employer must not block these efforts. Workers should also be able to talk openly with management about their working conditions without worrying about being punished or treated badly for it.
- **Respect local communities:** Respect the rights and views of the local communities around your sites and activities to ensure a clean and healthy environment for all.

FIND OUT MORE

- See the most widely recognised international human rights:
 - [The International Bill of Human Rights including the Universal Declaration of Human Rights and key international covenants 0245812.fm](#)
 - [The International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work: ILO_1998_Declaration_EN.pdf](#)
- **Course on PSCI Learnster:** PSCI offers many different courses on Human: [Learnster U](#). Please note that you must be either a PSCI member or a supplier to a PSCI member to access the courses.



Health and Safety

WHY THIS MATTERS

At Orion Pharma, Health and Safety is fundamental to how we operate. As a pharmaceutical company, safe operations are essential to protecting people, ensuring product quality, and maintaining business continuity.

Everyone has the right to work in a safe and healthy environment. A safe and healthy working environment protects workers from harm and injuries, supports well-being, and improves operational performance in all sectors and workplaces. By maintaining strong health and safety practices, you help protect people, reduce risks, and contribute to a responsible and resilient value chain.

WHAT WE EXPECT FROM YOU

- **Governance and management:** Provide a safe and healthy working environment, commit to occupational injury and illness prevention, and support the well-being of workers. Have a process in place to identify, assess, and either eliminate, minimize, or control potential occupational health and safety hazards and risks associated with your operations. Health and safety measures shall extend to your contractors and subcontractors, too.



We know that our business partners operate in different contexts and vary in size. We expect you to apply the requirement above in way that fits your organisation, activities, scale, and operating context.

- **Emergency preparedness:** Have in place emergency plans and response procedures and test them regularly. Testing and response procedures should include e.g. fire detection and protection, fire drills, evacuation process, and emergency equipment inspections.
- **Safety of the work environment:** Identify risks and have clear emergency plans to keep the workplace safe. Provide information and training so workers understand hazards – especially when handling dangerous materials – and know how to stay safe. Keep the workplace clean and orderly, promote a strong safety culture, and take extra care with high risk tasks and machinery. Use work permits where needed to ensure tasks are done safely.

- **Worker protection, health, and well-being:** Workers must be protected from harmful chemicals as well as biological and physical risks. Provide the right equipment, facilities, and support to keep them safe and healthy. Have clear processes in place to prevent and manage injuries and illness. When needed, check workers' health and monitor their exposure to risks. Give workers proper personal protective equipment (PPE) and make sure they know how to use it correctly.
- **Process safety:** If you use chemical or biological processes, make sure you understand the risks and have systems in place to prevent and mitigate accidents and control any dangerous releases of chemical or biological agents.

FIND OUT MORE

- Check out International Labour Organisation's (ILO) site on Occupational Health and Safety where you can find statistics, training courses, deep dives into e.g. topics spanning from climate change to the health of workers and much more: [Safety and health at work | International Labour Organization](#)
- **Courses on PSCI Learnster:** PSCI Learnster offers great deep dives into health and safety. See PSCI's offering: [Learnster U](#). Please note that you must be either a PSCI member or a supplier to a PSCI member to access the courses.



Environment

WHY THIS MATTERS

Scientific evidence shows that environmental challenges are accelerating. Climate change is already altering ecosystems globally, driving biodiversity loss, extreme weather events, and declines in the ecosystem services that societies and economies rely on. Water systems are under increasing stress, with climate change making water more scarce, unpredictable, and polluted and directly impacting communities, ecosystems, and industrial operations.

Environmental issues affect all companies regardless of industry – whether through energy use, transportation, digital technologies, artificial intelligence, heating and cooling systems, purchased goods and services, or the natural resources embedded in products and supply chains. Protecting the environment is fundamental to safeguarding human health, resilient supply chains, and the long-term availability of natural resources that all our industries depend on. That is why we encourage you to understand your environmental impacts, take action to reduce them, and continuously improve your environmental performance helping to build a more sustainable, resilient, and future-proof value chain.

WHAT WE EXPECT FROM YOU

- **Environmental authorizations and reporting:** Operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment and help your suppliers do the same. Comply with all applicable environmental laws and regulations. Make sure you have all required environmental permits, licenses, and registrations in place and follow all related rules, limits, and reporting requirements.



We know that our business partners operate in different contexts and vary in size. We expect you to apply this in way that fits your organisation, activities, scale, and operating context.

- **Management of waste and emissions:** Treat all waste, wastewater, and emissions in a safe way before releasing them, so they do not harm people or the environment. This includes carefully controlling any release of pharmaceuticals into the environment (PiE).



Even small amounts of medicines in the environment can harm wildlife and ecosystems – and us people too, through effects like antimicrobial resistance. Find out more about why PiE is an important global issue to tackle: [Pharmaceuticals in the Environment | UNEP – UN Environment Programme](#)

- **Climate change:** Monitor and reduce your greenhouse gas (GHG) emissions and support your suppliers to do the same.
- **Resource efficiency:** Strive for circularity and design out waste. Take measures to improve efficiency. Reduce the consumption of resources, including water, and favour renewable and sustainable sources. Take measures to reuse and recycle.



What do smart design and less waste have in common? A lot. Circular design helps prevent waste from being created in the first place by using resources more efficiently and keeping materials in use for longer. Learn more from the Ellen MacArthur Foundation: [Circular Design Meaning, Definition & Role | Ellen MacArthur Foundation](#).

- **Biodiversity conservation:** Aim to understand your impacts on biodiversity, reducing and mitigating your footprint wherever possible.
- **Spills and releases:** Have an effective system in place to prevent and mitigate accidental spills and releases to the environment and adverse impacts on the local community.
- **Use of hazardous materials:** Use hazardous materials only where necessary and actively seek safer alternatives. Ensure all hazardous substances are properly identified, handled, stored, and disposed of in a way that minimizes risks to human health and the environment.

FIND OUT MORE

- Orion Pharma's climate targets have been validated by the Science Based Targets initiative (SBTi). As part of our commitment, we aim to ensure that 78% of our suppliers by emissions have science-based climate targets by 2029. We therefore encourage you to set setting science-based targets of your own. Read more on our targets and Science-based targets: [Committed to science and sustainability: What do Orion's science-based climate targets mean?](#)
- Understand and, when material, manage your water-related risks with WWF's practical online tool. It helps you identify water scarcity, flood, and quality risks across your operations and supply chain and provides tailored recommendations for action. [WWF Water Risk Filter](#)
- Identify where your business may impact or depend on nature. WWF's tool helps you assess biodiversity risks across your value chain and guides you in prioritising actions to protect ecosystems and strengthen long-term resilience. [WWF Biodiversity Risk Filter](#)
- **Course on PSCI Learnster:** PSCI offers many courses on environmental questions on for example PiE, Energy Efficiency and Waste & Emissions: [Learnster U](#). Please note that you need to be member or a suppliers of PSCI to access to Learnster.

GLOSSARY

Due diligence: A continuous, risk-based process through which a company identifies, prevents, mitigates, and accounts for how it addresses actual and potential adverse impacts on people, the environment, and society across its operations and value chain.

Foreign Corrupt Practices Act (FCPA): A US law that prohibits bribery of government officials and requires companies to maintain accurate books, records, and accounting controls. Business decisions must be based on legitimate factors, not improper payments, gifts, or other benefits intended to influence decisions.

Grievance: A concern or complaint raised by an individual or group (e.g. workers, contractors, communities, or civil society organisations) related to your company's operations or business relationships.

Grievance channel: The entry point used to submit a grievance. Make sure it is accessible to your stakeholders, be it a WhatsApp group, a mailbox, an online reporting tool, or a union or external whistleblowing service – or a combination of many.

Grievance mechanism: The process established to receive, assess, investigate, and resolve grievance concerns.

OECD Guidelines for Multinational Enterprises: Government-backed recommendations providing voluntary principles and standards for responsible business conduct, covering areas such as human rights, labour, environment, and anti-corruption, and encouraging companies to contribute positively to sustainable development while avoiding harm.

Pharmaceuticals in the environment (PiE): the presence of active pharmaceutical substances in the environment, for example, in water, soil, or air, as a result of manufacturing, use, or disposal. These substances can affect ecosystems and potentially human health because they are designed to have biological effects.

Sustainability Due Diligence (SDD): The application of due diligence to environmental and human rights risks and impacts, requiring companies to identify, prevent, mitigate and address adverse effects in their own operations, subsidiaries and value chains. It also includes establishing appropriate governance, oversight and management processes to integrate these actions into business decision-making and operations.

Third Party: Third Parties typically refers to suppliers of products and services, but can also include, among others, agents, distributors, and wholesalers. All of Orion Pharma's Third Parties are required to implement the principles of the Third Party Code of Conduct.

UK Bribery Act: A UK anti-bribery law that prohibits offering, promising, giving, requesting, or accepting bribes in both the public and private sectors. It also creates a corporate offence of failing to prevent bribery.

United Nations Guiding Principles on Business and Human Rights (UNGPs):

A globally recognized framework that sets out the responsibility of states and companies to prevent, address, and remedy human rights impacts of business activities, built on three pillars: protect, respect, and remedy. The UNGPs have formulated the basis of sustainability due diligence.

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