

# Supplier Code of Conduct



**Alkermes**



## Purpose

Alkermes is committed to corporate responsibility and sustainability, as demonstrated by our adoption and adherence to high ethical standards of conduct, compliance and accountability in our business operations. We seek to do business with suppliers that share our commitment to ethical business practices and corporate responsibility and sustainability. As such, we have adopted this Alkermes Supplier Code of Conduct (this “Supplier Code”), which outlines our expectations for our suppliers, including, but not limited to, expectations related to:

- ◀ Labor and Human Rights
- ◀ Safety, Health and Well-Being
- ◀ Environmental Protection and Sustainability
- ◀ Ethical Business Conduct

For clarity, this Supplier Code is not intended to, and does not replace, supersede or conflict with any existing Alkermes contractual obligations or any applicable legal and/or regulatory requirements.

# Expectations

Alkermes expects that all of our suppliers conduct their business with us, or on our behalf, in a responsible and ethical manner, and in compliance with all applicable laws, rules and regulations.

## Labor and Human Rights

We expect our suppliers to treat their employees with dignity and respect and uphold human rights across their business operations, including internationally recognized rights to life, liberty and security, freedom of association, and fair labor practices in accordance with applicable laws, rules and regulations in the jurisdictions in which they operate. In this context, we expect our suppliers to abide by the principles of equal opportunity employment, to prohibit discrimination, harassment and retaliation of any kind, and to prohibit underage labor, human trafficking, child labor and slavery in any form.

## Safety, Health and Well-Being

We expect our suppliers to maintain a safe and inclusive working environment that protects the safety, health and well-being of its workers. We expect our suppliers to have processes in place to identify and mitigate health and safety risks, including (where applicable) those related to chemical, biological, and process safety considerations. Suppliers are also expected to implement and routinely test emergency preparedness procedures, including measures to ensure business continuity. At a minimum, we expect our suppliers to comply with all applicable health and safety laws and regulations.

## Environmental Protection and Sustainability

We expect our suppliers to conduct business activities in a responsible and sustainable manner that seeks to prevent pollution and minimize the environmental impacts of their operations and promote effective stewardship of environmental resources. Suppliers are expected to manage natural resources (e.g., sources of energy, water, raw materials), responsibly handle solid, liquid, and effluent wastes, and effectively control emissions to air and water, including implementation of programs to reduce greenhouse gas emissions. At a minimum, we expect our suppliers to comply with all applicable local and international environmental laws, rules and regulations, including obtaining all required environmental permits, licenses and information registrations, and following operational and reporting requirements.

## Ethical Business Conduct

We expect you, our suppliers, to share our commitment and adherence to responsible and ethical business practices, including, but not limited to, having policies and procedures in place to ensure your compliance with the following:

**Clinical Research Integrity and Ethics:** Adherence to high standards of scientific integrity and ethics; compliance with all laws, rules, regulations and industry guidelines governing the conduct of research and the integrity of scientific data applicable to the jurisdictions in which the research is conducted; and maintenance of policies, procedures and practices that are respectful of study participants and designed to protect study participant health, safety and well-being.

**Treatment of Animals in Research Studies:** Adherence to internationally recognized standards for the care, welfare and treatment of research animals, and the conduct of all animal research in compliance with local, national or international laws, rules and regulations applicable to the jurisdictions in which the research is conducted.

**Anti-Bribery and Anti-Corruption:** Compliance with all applicable anti-bribery and anti-corruption laws, rules and regulations in the countries in which you operate, including, but not limited to, the Anti-Kickback Statute and the U.S. Foreign Corrupt Practices Act (FCPA), the Irish Criminal Justice (Corruption Offences) Act 2018, the UK Anti-Bribery Act (2010), and all laws governing lobbying, gifts, political campaign donation laws, and payments to public officials.

**Antitrust:** Compliance with the antitrust, unfair competition and trade regulation laws, rules and regulations that govern the jurisdictions in which you conduct business activities, and prohibition of sharing, directly or indirectly sensitive pricing, cost or other business information with competitors or taking other actions that unfairly restrict trade or competition.

**Business and Financial Records:** Operation of a program or process to ensure that all business records and financial reports are accurate, complete, understandable, not misleading, and in compliance with applicable laws, rules and regulations.

**Conflict Minerals:** Maintenance of procedures to reasonably assure that if materials or products containing specific minerals (i.e., tantalum, tin, tungsten and gold) are supplied to Alkermes, such products or materials are sourced responsibly and not from areas of known conflict, nor directly or indirectly benefit armed groups.

**Conflicts of Interest:** Operation of a program or process to ensure that all financial, business and other activities outside of those conducted for or on behalf of Alkermes do not conflict with your responsibilities to Alkermes and are free from undisclosed actual or potential conflicts of interest in respect of your business with Alkermes.

**Counterfeit Products:** Identification and mitigation of counterfeit products, illegally diverted products or stolen products in your supply chain or in the marketplace.

**Data Privacy and Confidentiality:** Compliance with applicable laws, rules and regulations related to data privacy and the safeguarding and appropriate use of confidential or sensitive information obtained in connection with business activities conducted for, or on behalf of, Alkermes; and operation of a program or policy to ensure measures are in place to protect such data or information from any unauthorized access or use and from information security risks, including cybersecurity risks.

**Insider Trading:** Compliance with U.S. insider trading laws and the maintenance and operation of programs or policies that prohibit your employees from trading in Alkermes securities while in possession of material, non-public information obtained in connection with your business relationship with Alkermes.

**Supplier Selection:** Maintenance and operation of a process or program—that substantially adheres to, and promotes, the standards set forth in this Supplier Code—through which you evaluate your suppliers.

**Trade Controls:** Compliance with all laws, rules and regulations applicable to the import, export, re-export, release and/or other transfer of material, equipment, samples, software, services, technical data and/or any other goods or services.

## Management and Reporting

We expect our suppliers to comply with this Supplier Code and to have management systems and training programs in place that demonstrate their commitment and accountability to the standards set forth in this Supplier Code, including mechanisms and procedures in place to identify and manage risks for each area addressed by this Supplier Code, and to maintain documentation where possible to demonstrate conformance.

We reserve the right to monitor a supplier's compliance with the principles set forth in this Supplier Code, to take such monitoring into account when selecting new suppliers or renewing supplier engagements, and to take appropriate action, including potential termination, if a supplier fails to comply with this Supplier Code. We also reserve the right to amend this Supplier Code from time to time to continue to ensure adherence to high ethical standards of conduct, compliance and accountability among our suppliers.

We expect our suppliers to promptly report any known suspected or actual violations of applicable laws, rule or regulations or of this Supplier Code related to services being provided to Alkermes, or on behalf of Alkermes, by contacting the supplier's Alkermes business partner or emailing us at [suppliercode@alkermes.com](mailto:suppliercode@alkermes.com).





For more information, please visit us at [www.alkermes.com](http://www.alkermes.com)