

Procurement Policy

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1. Aim of the Policy

Gedeon Richter Plc. ("Company"):

- **knows and understands** the effects of its procurement processes on its own performances,
- **is committed to** continuously improving its procurement processes and performances and maintaining compliance with the changing external and internal requirements,
- **undertakes to** combine the Company's more than 100 years of traditions, extensive pharmaceutical and other knowledge with the technical requirements of modern procurement.

Procurement considerations are an integral part of the Company's economic decisions. The main focus is on keeping the Company's basic procurement principles in mind, while ensuring the availability of the necessary materials, tools and services in a cost-efficient manner, at the right place and time, in the right quantity and quality, in order to help the Company achieve its strategic goals.

In order to enforce the above requirements, the Company takes into account the following principles in its activities.

2. Principles of the Policy

- **Cost-effectiveness**
Particular attention should be paid to ensure reasonable and economical management of the costs incurred. Purchases should be made using cost-effective methods, at the lowest cost over the entire life cycle.

- **Quality-oriented approach**
Business partners should be selected with the utmost care, ensuring their trustworthiness, reputation and, last but not least, the quality of their products/services.
- **Environmental protection**
During the purchasing process, solutions resulting in the lowest possible environmental impact should be favoured.
- **Energy-effectiveness**
The procurement of products, equipment and services that have a significant impact on the energy performance of the Company should seek to continuously improve this performance, taking advantage of the opportunities in procurement to positively influence the energy-related behaviour of supply chain members.
- **Compliance with legal requirements**
During procurement it must be ensured that the activities fully satisfy the relevant domestic and foreign legal requirements, and that they comply with the rules and standards specified by the relevant professional bodies and the general domestic and foreign practices.
- **Competition law**
The Company also attaches great importance to the enforcement of fair competition and competition law in its procurement processes and, where possible, intends to select its business partners through open tender in order to achieve the widest possible bidding base and the greatest possible cost-effectiveness.
- **Equal opportunities, equal treatment**
A level playing field must be created for all business partners; they must be treated in an objective and equal way, without bias and prejudice. The Company expects from its business partners to provide equal employment opportunities, and to treat employees without regard to personal characteristics such as race, colour, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by local laws) or other characteristics protected by applicable laws.
- **Cooperation**
The Company's business partnerships are based on fair and ethical business cooperation.
- **Integrity**
The employees concerned must separate their personal and business interests. Individual interests and personal gain cannot play a part in procurement, neither from the employees' side nor from the business partners' side. In this regard, any direct or indirect relationship between the business partners and the Company's employees that may affect any business relationship which may be established or already exist between the business partners and the Company must be disclosed and notified to the Company prior to the business negotiations.

- **Confidentiality**
Confidentiality of business information is a top priority for the Company throughout the procurement process. The Company expects its business partners to treat all information (regardless whether in oral or written form) which is acquired during its cooperation and relationship with the Company as trade secrets.
- **Personal data protection**
The Company, its business partners and its agents under the relevant legal regulations are accountable for protecting personal data, and for processing personal data only within the boundaries of applicable laws, the Company policies and procedures. The Company, its business partners and its agents help protecting the privacy of the individual, including personal data relating to health status, medical treatment, sickness, race and ethnicity, religious, political or other philosophical belief (which are defined as special categories of personal data).
- **Anti-corruption**
The Company requires compliance with the highest ethical standards and the Company is committed to complying with all local and international anti-bribery and anti-corruption laws and regulations that may be applicable to its business worldwide.

The Company values integrity and transparency, and has zero-tolerance for bribery and all other corrupt activities, whether committed by its own employees or by its business partners acting for and on behalf of the Company. Regardless of local custom, business culture, or the nature of the requests for bribes or other improper advantage, the Company's employees and its business partners are strictly prohibited to engage in or remain willfully blind to corrupt activities in connection with the Company's business.

- **Prevention on money laundering**
The Company's business partners are obliged to comply with the legal provisions aimed at preventing money laundering and must not participate in any money laundering activities.
- **Human rights, combating human trafficking, child and forced labour**
The Company expects from its business partners to respect human rights as defined in the relevant international conventions and in local laws and regulations.

The Company strongly condemns practices of human trafficking, child exploitation and forced labour and is committed to prevent these practices in its operations, as well as in its supply chain and the Company also opposes harsh and cruel treatment of employees.

3. Commitment

Adherence to the above principles is the obligation of all employees and business partners of the Company. The principles serve as guidelines for the development of detailed rules

related to the Procurement Policy and shall be taken into account in their practical application.

The present Procurement Policy shall enter into force on the date of its signature and shall simultaneously repeal the Procurement Policy dated on the 28th of June 2016.

Budapest, 06. December 2022



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Orbán Gábor
Chief Executive Officer