

THIRD PARTY CODE OF CONDUCT

Standards of integrity and business ethics





1. Introduction

Vetcare’s task is to promote a better, safer, and more sustainable quality of life for companion and farmed animals. We ensure that people working with animals have the best preconditions for taking good care of the animals and that they have at their disposal care recommendations based on the latest scientific knowledge, plus optimal medicines, supplements, and equipment.

In addition to animal wellbeing, it is also important for us to take care of people, the environment, and our financial responsibilities. We are committed to operating responsibly and we also require all of our partners to do the same. To support this aim, we have created an ethical code of conduct to make Vetcare’s objectives concerning the wellbeing of animals, people, and the environment as clear and unambiguous as possible to all parties.

Our code of conduct applies to all of our partners and we require them to commit to the operating principles in these guidelines. In doing so, we wish to ensure good, long-term, profitable, and healthy relationships with all of our partners in the future.

2. Employees

Our partners must commit to respect for human rights and national legislation concerning employees.

2.1. Discrimination

Our partners may not discriminate, exclude, or favour people due to their sex, age, religion, race, place of birth, social background, disability, ethnic background or nationality, membership of a union or other legal organization, political alignment or opinions, sexual orientation, family obligations, marital status or other comparable reason.

2.2. Treatment

Partners must offer their employees a safe and fair workplace. All inappropriate behaviour and behaviour that breaches human rights, including sexual harassment, sexual exploitation, mental or physical coercion, or verbal abuse must be prohibited. Even the threat of the behaviour mentioned above must be prohibited.

2.3. Health and safety

Partners must respect employees' right to safe working and living conditions. Vulnerable people, such as young employees, new and expecting mothers, and people with disabilities and health conditions, must be given special consideration. Employees must be given sick leave or maternity/parental leave in accordance with national legislation. Pregnancy must not be used as grounds to terminate an employee or place them in a weaker position in comparison to other employees.

The employee's safety must always take priority. Working in an unsafe environment is unacceptable. Partners must undertake appropriate action to ensure the safety of the equipment and buildings, and to protect against predictable emergencies. In addition, partners should always offer all employees effective personal protective gear free of charge, and ensure that the personal protective equipment is used appropriately.

2.4. Use of child labour

Neither partners nor their subcontractors may use child labour. Young workers must only be employed in non-hazardous work and only then when the young workers have reached the age of employment in accordance with national legislation.

2.5. Salary, benefits, and working hours

Partners must pay employees in accordance with locally applicable national salary laws, including minimum wage, hours worked overtime, and mandatory benefits. Partners must clearly agree on salary principles when agreeing on the employment relationship. Partners are also expected to communicate to their employee whether overtime is required and the rate of remuneration for overtime. The employer must take care of social security payments and taxes required by national legislation on the company employee's behalf.

2.6. Trade unions and freedom to organize

Partners must respect employees' rights in accordance with local legislation concerning the freedom to organize, to join or not join trade unions, seek representation, or join labour councils. Employees must be able to communicate openly with management about working conditions without the fear or threat of punishment or harassment.

3. Environmental safety

Partners must operate responsibly and effectively to minimize their detrimental environmental impacts. We require our partners to spare natural resources in accordance with sustainable principles, to avoid the use of hazardous materials where possible, and to promote the recycling of materials and raw materials.

3.1. Environmental legislation and permits

Partners must comply with all applicable environmental regulations. All required permits and registrations must be obtained and their operating and reporting requirements must be fulfilled .

3.2. Waste, emissions and other hazardous situations, and their prevention

Partners must have systems to ensure the safe processing, transfer, storage, recycling, reuse or management of waste and emissions into air or waterways. All waste, wastewater and emissions that can have adverse effects on human health or the environment must be appropriately processed before release into the environment.

Partners must

- use systems to prevent and mitigate accidental leaks and discharges into the environment
- protect employees against excessive exposure to chemical, biological and physical hazards, and physically demanding tasks in the workplace and all of the residential facilities provided by the company.
- identify and assess emergencies in the workplace and in residential areas provided by the company, and to minimize their impact by implementing emergency plans and operating methods.
- safety data concerning hazardous materials, including pharmaceutical compounds and pharmaceutical intermediate products, must be available in order to train employees and to protect them from harm.

4. Ethicality

We require our partners to operate ethically, honestly, and in line with good business practice. Ethical elements include:

4.1. Honesty of business operations, reputation, and fair competition

All forms of corruption are absolutely prohibited. Partners may not give or receive bribes or participate in other illegal incentives in business or management relationships.

Partners are not permitted to disclose Vetcare's outlook for the future, product development projects, or upcoming business operations to parties outside of our collaboration, nor to reveal any confidential information they possess which would potentially harm Vetcare's reputation, market position, or partnerships.

Partners must operate in accordance with fair and market-based competition and with respect for competition legislation.

4.2. Conflict of interests

Vetcare expects no conflict of interests among its partners' personnel. A conflict of interest occurs whenever the potential for direct or indirect personal benefit affects or appears to affect an employee's judgement or actions when doing business with Vetcare. If an employee encounters a conflict of interest pertaining to their collaboration with Vetcare, they should bring the matter up with their own supervisor.

4.3. Corruption

Corruption is activity in which a person (an official or a private individual) suggests, requests, or accepts bribes, offers, or promises that directly or indirectly affect decision-making in exchange for performing, delaying, or failing to perform an action which is directly or indirectly one of the person's tasks.

There are two kinds of corruption:

- Active corruption occurs when the person giving a bribe suggests an action that can be classed as corruption
- Passive corruption is when the person receiving the bribe carries out the act of corruption.

4.4. Entertaining, reasonable hospitality, and reception of gifts

Business operations can involve occasional business-related entertaining or the exchange of nominal-value gifts, which is not considered to be corruption.

Vetcare's employees can accept entertaining relating to certain visits as long as it is: legal and ethical, occasional, ordinary, reasonably priced, and linked to Vetcare's business needs or requirements (and not just for the personal wellbeing of employees).

Vetcare's employees must NOT accept travel and overnight accommodation if it does not directly and tangibly relate to work tasks, nor may our partners offer our employees such. If a host company has committed to pay for accommodation, this may only be accepted for days on which a Vetcare employee performs necessary tasks at the host's premises.

Vetcare's employees may receive gifts of nominal value (such as pens, mugs, calendars, etc.) if such gifts are occasional, of low value, and part of an ordinary business relationship.

With the exception of the aforementioned cases, Vetcare's employees (and their close relatives) may not directly or indirectly receive or request incentives from Vetcare's partners that could be considered to be bribes, including but not limited to:

- Holidays;
- Payments in cash
- Ready cash (e.g. gift cards or cheques)
- Services
- Discounts (except for those which are offered to all Vetcare personnel)

Under no circumstances may entertainment events or the exchange of gifts cause a conflict of interest with Vetcare's values concerning transparency and honesty.

If you would like more information about the principles that apply to your interaction with Vetcare, please contact Vetcare's COO, whose contact details can be found at the bottom of this code of conduct.

4.5. Marketing of medicines

All marketing and sales promotion materials and activities must uphold high ethical, medical and scientific standards and comply with all applicable national legislation, rules and regulations, as well as any Vetcare technical support and branding guidelines.

Information presented in and in connection with the marketing of medicines must be appropriate. Material must thoroughly present the various effects of the use of the medicine and thereby provide instructions for the correct and safe use of the medicine. Information given about the medicine must be up to date and it must be based on the latest knowledge. The commercial nature of medicine marketing must not be concealed, and medicine marketing must be clearly identifiable as marketing.

Marketing may not fail to communicate essential matters, the omission of which could give a false impression of the medicine, its composition, origin, medical significance, or quality. Marketing may not refer to clinical research in a way that gives a false impression of the results, scope, or significance of the research.

Vetcare's product distributors must ensure that marketing material for Vetcare's products always complies with marketing legislation.

Campaign and marketing material that mentions products other than Vetcare's products (competitors' products) must present these other products in a fair way and based on scientific sources.

4.6. Sales promotion activities (applies to Vetcare product distributors)

Interaction with veterinary science professionals and clinical personnel aims to improve veterinary scientific practice and ultimately to benefit animals and their owners. Interaction should focus on making medical personnel aware of products, providing information about veterinary science and training, and/or supporting research into veterinary science. Medical personnel may not be offered anything in a way that has an inappropriate impact on the use or prescription of a veterinary medicine, or which could be considered as an incentive to favour a particular medicine. It is not permitted to give or offer any financial benefit or payment in kind (including grants, stipends, support, consultant agreements, training supplies or goods relating to practice) if the aim is to inappropriately influence the use, prescription, purchase, delivery, distribution or administration of a medicine.

4.7. Privacy

Partners must protect the confidentiality and security of identifying personal data in accordance with international legislation and regulations. The use and disclosure of identifying personal data must be restricted to those purposes for which the data was obtained. (GDPR).

5. Compliance with the code of conduct, and reporting

Vetcare encourages partners' employees to report any practices at their company which breach this code of conduct to the email below.

Petri Bäcklund, Chief Operating Officer

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