

Orifarm Group A/S

COMMUNICATION ON PROGRESS 2018



CEO introduction

Orifarm Group joined the UN Global Compact in 2018 in order to confirm our commitment to the principles of responsible business conduct promoted by the UN Global Compact in the areas of human rights, labor rights, environment and anti-corruption. In this, our first annual Communication on Progress (COP) report, we describe our approach and actions to integrate the Global Compact's 10 principles into our business strategy, culture and operations.

We have identified areas in which we have the possibility to positively impact a sustainable development for our company and hence how we can improve further going forward. Equivalently, we have identified where we are at risk of impacting human rights, labor rights, the climate and environment in a negative way or being complicit to corruption and bribery in order to be better at mitigating the risks.

This report also serves to comply with the Danish Financial Statements Act §99b.

A handwritten signature in black ink, appearing to read "Erik Sandberg".

Erik Sandberg, CEO

Orifarm Group business model & values

Orifarm Group is an ambitious operator in the European market for pharmaceuticals. Our ambition is to supply high quality pharmaceuticals at a low cost. In other words: We offer consumers and societies more healthcare for their money.

Orifarm Group consists of two operating areas: Orifarm Parallel Import (PI) and Orifarm Generics.

Common for both operating divisions is healthcare business model innovation. This is expressed in Orifarm Group’s mission statement which is “*Challenging the pharmaceutical market*”.

Orifarm Group’s vision - “*We want to be number 1 in making healthcare a better deal*” - expresses the general objective. “A better deal” does not only refers to savings, but also to how Orifarm Group delivers solutions that meet its stakeholders’ needs. Orifarm Group’s operating activities are guided by our values which are flexibility, ambition, responsibility and customer centricity.

Value chain Parallel Import (PI)

Orifarm PI imports pharmaceuticals from EU member states and transports them to our repacking facilities in Czech or Denmark. After repacking the products, Orifarm Group distributes the pharmaceuticals to customers in 8 EU markets.

Orifarm Group’s own operations include production of boxes, printing leaflets and repacking the products. For the rest of the value chain, Orifarm Group relies on external partners, suppliers and customers.



Value chain Generics

Orifarm Group’s own operations includes development and manufacturing of Generic medicine for 11% of our product portfolio via our production facility Viminco. For the rest of our portfolio and for the rest of the value chain, Orifarm Group relies on external partners, suppliers and customers.



About the report

The report is organised into four main headlines addressing the 10 principles of the UN Global compact. The 10 principles of the UN Global compact are:

Human rights

1. Businesses should support and respect the protection of internationally proclaimed human rights.
2. Make sure that they are not complicit in human rights abuses.

Labor rights

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. The elimination of all forms of forced and compulsory labor.
5. The effective abolition of child labor.
6. The elimination of discrimination in respect of employment and occupation.

Environment

7. Businesses should support a precautionary approach to environmental challenges.
8. Undertake initiatives to promote greater environmental responsibility.
9. Encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.

Orifarm Group and the Sustainable Development Goals

Our first COP report focuses on the commitment to the 10 principles for UN Global compact.

In addition, as an international organization Orifarm Group understands its responsibility in forming a sustainable future. We therefore support the 17 UN's Sustainable Development Goals (SDGs) and its underlying 169 targets. The SDGs represent the most pressing global challenges of today and act as a framework towards sustainable development and long term value creation.

To guide Orifarm Group's future commitment, in context of our business model and core activities, we have chosen to prioritize 4 SDGs in our pursuit of minimizing our negative impact of our business operations and increase our positive contribution from our value creation and our products. The SDGs are;

3. Good health and wellbeing
8. Decent work and economic growth
12. Responsible consumption and production
13. Climate action

Throughout the report, the reader will find references to how Orifarm Group contributes to the SDG's.

Human rights

It is essential for Orifarm Group to comply with international human rights and labor standards and to work against discrimination. Orifarm Group is obliged to do so through its commitment to UN Global Compact.

Our policies towards human rights are stated in our corporate social responsibility policy and our supplier code of conduct forms the basis for dialogue of human rights in our value chain.

Main risk areas:

We conduct assessment on risk and impact related to human rights in Orifarm Group's operations and in our value chain. We have identified the following areas as having the most significant impact on human rights.

- Patient safety
- Privacy
- Non-discrimination
- Human rights in supply chain

Patient safety

The core business of Orifarm Group is development of and trading with pharmaceuticals. Orifarm Group has to be in compliance with international and national law and regulations to be allowed to develop and trade pharmaceuticals. Breaching can have a significant impact on patients health and safety and pose both reputational and financial risks to Orifarm Group.

Orifarm Group has established pharmacovigilance procedures and procedures for correct handling, storage and transporting the goods. Procedures that continually are reviewed for improvement. Finally, Orifarm Group has procedures for receiving potential complaints via "info@orifarm.com" or via our customer service channels. Control, safety and documentation are keywords in those processes.

| | Actual 2018 | Target for 2019 |
|---|-------------|-----------------|
| Non-compliance of health and safety impacts of products | 0 | 0 |

GRI standard 416-4

Orifarm Group performs quality audits with all 1st tier suppliers to secure that Good Manufacturing Practice and Good Distribution Practice (GMP/GDP) requirements are met. Potential non-compliance incidents are handled via Orifarm Group's quality procedures.

Privacy

We have a focus on privacy and protection of personal data throughout the Orifarm Group, covering both the data of consumers, employees and business partners. Orifarm Group has taken solid measures to protect personal data and is in full compliance with the General Data Protection Regulation (GDPR). All of our white collar employees have been educated in the GDPR rules during 2018.

| | Actual 2018 | Target for 2019 |
|---------------|-------------|-----------------|
| GDPR breaches | 0 | 0 |

Human rights policy

In all Orifarm Group operations and activities, we respect human rights and avoid infringing the human rights of involved individuals.

We believe that through our product we may contribute in a positive manner to the human rights to health and wellbeing by paving the way for accessibility to affordable and high-quality medicine for all.

To reduce the risk for setting aside relevant human rights for our business, we ensure compliance with human rights related legislation, and identify actual and potential risks from activities in our business units and facilities. Identified risks that are directly linked to our operations and to the services of our business partners are mitigated and prevented.

In Europe we thus have a focus on privacy and protection of personal data throughout the Group, covering both the data of consumers, employees and business partners.

Non-discrimination

Orifarm Group is against any form of discrimination and strives to treat all staff and potential applicants the same regardless of sex, age, sexuality, ethnicity, disability or life situation, attitudes, religion, interests, ambitions, life philosophy and other personal interests. In 2018 there has been no incidents of discrimination in Orifarm Group.

| | Actual 2018 | Target for 2019 |
|-----------------------------|----------------|--------------------|
| Incidents of discrimination | 0 | 0 |

GRI standard 406_1

During 2019 all Orifarm Group’s staff policies regarding non-discrimination and ethical behavior will be reviewed, updated and communicated to all Orifarm Group employees.

Human rights in the supply chain

In our Supplier Code of conduct, we communicate our expectations to our suppliers on responsible business behavior within human rights. Further elaboration on risks, results achieved and future plans for our work on responsible sourcing can be found in the section about responsible sourcing on page 15.

Orifarm Group and the Sustainable Development Goal 3: Good health and well-being

3

GOOD HEALTH
AND WELL-BEING



Orifarm Group contributes with:

- Orifarm Group distributes high quality pharmaceuticals at a low cost thereby offering consumers and societies more healthcare for their money

Labor rights

In addition to following laws and implemented collective agreements, Orifarm Group acknowledges the importance of being able to attract and retain a diverse and qualified workforce to continue to be competitive. Retaining and attracting qualified staff are high on the Orifarm Group agenda and we follow best practice recruitment processes and offer a competitive benefit and compensation set-up.

Main risk areas:

We conduct assessment on risk and impact related to labor rights in Orifarm Group's operations and in our value chain. We have identified following areas as having the most significant impact on labor rights.

- Diversity and equal opportunity
- Training and education
- Labor in our supply chain (goods suppliers and transportation)

Besides focus on the main risk areas, we continue our focus on labor management/relations and health and safety.

Diversity and equal opportunity

It is imperative for Orifarm Group to comply with international human rights and labor standards and to work against discrimination. Orifarm Group also respects national legislation on equal opportunity. We believe in an engaged and competent workforce, recognizing the benefits of diversity in respect of gender, culture, age, education and experience.

Orifarm Group supports an incorporating labor market and offers opportunities for people with varied capabilities including staff with physical or mental disabilities or people who has been outside the labor market for a significant time period. Orifarm Group is a member of the Odense Charter for Mangfoldighed, a forum that supports and drives diversity in all its forms. Orifarm Group's workforce today spans more than 20 nationalities and ranges in age from student workers to employees +65 years. In addition, we have strong representation of women at Team Manager and Department Manager level. Our focus in the coming years is to strive for a more diverse gender representation at senior management levels.

The Supervisory Board of Orifarm Group currently consists of 6 general elected members and 3 staff elected. There is 1 female general elected member. In addition to the female general elected member Orifarm Group has 2 female staff elected members and a female observer.

The ambition is to have at least 40% of both genders represented at all Orifarm Group's management levels by 2023. Our diversity strategy has a longer term horizon as this needs to be weighted against our current competence pool and needs of the business. Our policy is to recruit the best candidate for a given position. If more candidates are assessed equal on competencies, the underrepresented gender will be chosen for the position. This effort will be attempted for in consideration of always selecting the best candidate for the task. Orifarm Group will strive for ensuring that the successor planning includes considerations for meeting the diversity ambition.

Labor rights policy

It is important to us that sustainable management is visible in all parts of our organization. To achieve this, we have a strong and continuous focus on taking good care of our employees and to create a motivating environment, where our employees thrive and develop.

We value being a social and friendly organization that accommodates diversity. Diversity in Orifarm Group is about recognizing employees because of, not despite of, the fact that they are different. We see the potential of each employee and create opportunities for everyone to develop at work, irrespective of their gender, ethnicity, disability or other personal characteristics. Diversity thus provide us with an opportunity to share experiences and gather learnings across different cultures and to transform this knowledge into a competitive advantage.

The well-being and motivation of our employees is dependent on a healthy and safe workplace. To ensure this we comply with legislation and collective agreements on fair wages, rest and leisure, equal remuneration for men and women, anti-discrimination and equal opportunities in access to employment and career.

In our supply chain and with other business partners we are committed to identify and mitigate or eliminate any risk for infringing the right to freedom of association and to collective bargaining. We are also committed to eliminate all forms of forced and compulsory labor and to effectively abolish child labor.

| Women in management % | 2018 | Target for 2023 |
|-----------------------------|------|------------------------|
| Orifarm Group Board | 17% | 40% |
| Executive Management | 33% | Ratio to be maintained |
| Senior Management (SVP, VP) | 24% | 40% |
| Management (TMs, DMs) | 46% | Ratio to be maintained |

GRI Standard 405_1

Labor / Management relations

Focus on employee satisfaction and motivation supports the well-being and performance of our employees helps minimize negative impacts on the business. For our Danish and German operations Orifarm Group has established workers' councils that have formalized regular meetings with the Executive Management. All minutes from the workers' councils' meetings are published on the Orifarm Group intranet.

Moreover, Orifarm Group has three staff elected representatives in the Orifarm Group Board of Directors.

We have a continued focus on establishing strong labor-management relations and in 2018 we had an intensive focus on our Czech site which had a significant higher employee turnover than the rest of the group. Orifarm Group has 50% of its workforce employed at our Czech operations. The activities included introduction of a new compensation and benefit model, intensified leadership assessment and training as well as a focus towards decreasing sickness rates. With these activities we aim to decrease our employee turnover at our Czech site from 30% to 20% in 2019.

| | Actual 2018 | Target for 2019 |
|-----------------------------------|-------------|-----------------|
| Employee turnover – Orifarm Group | 24% | 20% |

*GRI standard 401_1

Training and education

It is important for Orifarm Group to ensure development opportunities for its employees. In accordance with the value "ambitions" and "responsibility" Orifarm Group has developed a performance culture that both secures focus on the individual, the team and on the strategy of Orifarm Group.

Performance management in Orifarm Group happens through targeted onboarding programs, management feedback from educated and trained managers, yearly appraisals sessions and follow up meetings, people review sessions, talent management training and our employee satisfaction survey. All employees including temporary workers and students in Orifarm Group are offered annual appraisal interviews. Not all employees accept the opportunity, but the percentage of held reviews are high, especially at the Danish site with 93% held reviews in 2018.

| | Actual 2018 | Target for 2019 |
|--|-------------|-----------------|
| Offered regular performance and career development reviews | 100% | 100% |

GRI standard 404_3

Employee development, training and education are high on the agenda in Orifarm Group. We believe that it is essential for strong employee satisfaction and motivation. Orifarm Group offers a wide variety of internal training and education programs including:

- Leadership development
- Upgrading specialist skills
- Increasing industry knowledge
- Professional focus i.e. education in regulatory requirements

In addition, Orifarm Group works with a range of external educational institutions and course providers. In 2019, we will intensify and further develop our leadership and talent programs.

Health and Safety

Focus on employee satisfaction, health and safety is essential for the well-being and the performance of Orifarm Group's employees. We want our employees to be able to thrive at work. Also, this helps to minimize illnesses and lost working days and thereby reduce risks to the business. Our target is to have no injuries leading to absence at any Orifarm Group location.

Orifarm Group has established health and safety organizations for the German and Danish organizations and established health and safety policies and procedures that are incorporated and followed throughout the organization. At our Czech operations we have well-defined safety procedures, training to all employees and we meet all legislative requirements on health and safety. In addition, we work with an external consultancy to improve processes, evaluate risk areas and secure full transparency on health and safety issues.

At our Danish operations, our Health and Safety organization meets quarterly with a formal procedure and fixed agenda where important topics related to both physical and psychological working environment are monitored and addressed. Orifarm Group is fully compliant with workers' environmental legislation. During 2018 there has been special focus on the role of the employee elected members' accessibility, communication and consultancy role towards the organization. In 2019, reduction of noise at work stations and in the canteen at our Odense site will be in focus.

| | Actual 2018 | Target for 2019 |
|--|----------------|--------------------|
| Injuries led to absence* at a Orifarm Group location | 0 | 0 |

GRI standard 403_9, *whole day absence

In 2018 Orifarm Group strengthened our focus on mental well-being. We have improved professional support from dieticians and psychologists via our insurance cover. In addition, we encourage our employee to a healthy lifestyle via support for physical and social activities like the DHL Relay Race, "Biking to work" and "Count your steps" initiatives as well as we offer employees the possibility of massage. Finally, we ensure that our canteens at the sites in Denmark, Germany and Czech offer varied and healthy food.

Labor rights in the supply chain

In our Supplier Code of conduct, we communicate our expectations towards our suppliers on responsible business behavior within labor rights. Further elaboration on risks, results achieved and future plans for our work on responsible sourcing can be found in the section about responsible sourcing on page 15.

Orifarm Group and the Sustainable Development Goal 3: Good health and well-being

3 GOOD HEALTH
AND WELL-BEING



Orifarm Group contributes with:

- Promoting healthy lifestyle to our employees via activities and healthy canteen offerings

Orifarm Group and the Sustainable Development Goal 8: Decent work and economic growth

8 DECENT WORK AND
ECONOMIC GROWTH



Orifarm Group contributes with:

- Solid employee satisfaction and motivation
- Equality principles in recruitment, training, remuneration, promotion and development
- Healthy workforce
- Regular performance and career development reviews to all employees

Environment

Climate & Environment policy

It is our aim to contribute to a better environment by ensuring that environmental concerns form a natural part of all our activities. This includes a precautionary approach to environmental challenges and promotion of environmentally friendly technologies internally in the Group and among business partners.

Orifarm Group operations affects the environment primarily through the consumption of energy and resources in our buildings and for transportation, but also via our production. We therefore constantly work to reduce our energy consumption and emissions, and improve waste management. We apply a systematic approach to environmental management and comply with all legislative requirements.

To minimize environmental impact, we have incorporated an environmental policy throughout the whole organization that guides us.

Pharmaceuticals impact the environment primarily as a result of patient use passing through our bodies and into waterways. Secondly, it impacts the environment via improper disposal of unused medicine and manufacture of medicine. As a manufacturer and distributor of pharmaceuticals, we recognize the risks associated with our business model.

Main risk areas

Assessing our operations and value chain we have identified the following areas as having the most significant environmental impact.

- Energy and water consumption
- Waste management
- Emissions in connection with transportation of products

However to further understand our collective environmental footprint of our operations we will work towards a more comprehensive baseline. Our ambition in relation to climate and environment is viewed on a five year horizon to secure a continued and sustainable focus on minimizing our impact on the environment.

As an employee intensive organization our electricity and water consumption follows the number of people employed, while our gas and heating consumption is depending of the amount of m² we have to heat or cool.

Energy consumption

| | 2018 | | Target for 2023 | | 2018 | Target for 2023 |
|-----------------------|---------|--------------------------------|-----------------|-------------------------|---------------------|-----------------|
| | Total | Intensity | | | % renewable | |
| Electricity (MWh) | 3.498 | MWh/FTE | 3,3 | 10% intensity reduction | 29% (100% in DK) | Maintain |
| Gas (m ³) | 149.496 | m ³ /m ² | 2,82 | 10% intensity reduction | | |
| Heating (Gigajoules) | 102.715 | GJ/m ² | 4,10 | 10% intensity reduction | | |

GRI standard 302_1, 302_3

In 2019, Orifarm Group continues to work on reducing its energy consumption within our operations and presently the following initiatives are planned:

- Ongoing energy optimization by replacing traditional light with LED lights and installing light sensors
- Rewrite purchasing policies to include sustainability considerations in relations to equipment and machinery

Water consumption

| 2018 | | | | Target for 2023 |
|-------------------------|-------|-----------|-----|--------------------|
| | Total | Intensity | | |
| Water (m ³) | 7.143 | m3/FTE | 7,1 | Maintain intensity |

GRI standard 303_5

In 2018 our water consumption increased due to the decision to take the canteen operations inhouse at our CZ operations. Water usage in our production is primarily used for cleaning purposes.

Waste

A core business operation for Orifarm Group is the unpacking and repacking activities in relation to our PI business. Therefore waste management is placed highly on our corporate list of responsibilities.

| 2018 | | | | Target for 2023 | 2018 | Target for 2023 |
|--------------------|---------|-----------|--------|-------------------------|------------|-----------------|
| | Total | Intensity | | | % recycled | |
| Mixed (kg) | 187.500 | Kg/FTE | 97,7kg | 20% intensity reduction | -- | --- |
| Chemical (kg) | 54.894 | g/box | 1,8g | 20% intensity reduction | -- | --- |
| Plastic (kg) | 19.740 | g/box | 0,6g | Maintain intensity | 100% | 100% |
| Paper (kg) | 460.395 | g/box | 14,8g | Maintain intensity | 100% | 100% |
| Organic waste (kg) | 3.774 | Kg/FTE | 3,6kg | Include CZ and DE site | 100% | 100% |

GRI standard 306_2

In 2018 a high proportion of Orifarm's PI production changed from relabeling of existing boxes to repacking in new boxes. This creates more paper waste, however the move from plastic labeling to repacking makes it eligible for future recycling compared to disposal of labelled boxes after end use. All paper and plastic waste from all Orifarm Group's operations and locations is recycled.

Being a labor intensive organization Orifarm Group naturally creates mixed waste. In 2019, Orifarm Group will intensify its information and training on how to sort waste to reduce the amount of non-recycled mixed waste created. Focus will be on our production sites in Czech and at Viminco. Currently, we separate and recycle organic waste from our canteen at our Odense site. In 2019 we will introduce separation of our organic waste at the Czech canteen as well.

A key challenge for Orifarm Group is the use of plastic cups for employees in our production. In 2019 we will work to find an alternative and more environmentally friendly way for employees in our Czech operations to be hydrated by.

Orifarm Group creates chemical waste due to the nature of our business. All disposal within Orifarm Group's operations are handled within all legislative guidelines. It is a key concern for Orifarm Group to limit its chemical waste and we are continuously looking for ways to optimize our planning and corporation with our suppliers in reducing chemical waste.

Transportation

As a parallel trader, transporting products to and from import and export markets, is a prerequisite of our business. Transportation creates CO² emissions and we continue to strive for ways to limit our most CO² emission intensive transportation.

| Transport 2018 (% share of total transportation) | | Target for 2023 |
|--|-----|-----------------|
| Road | 93% | 95% |
| Courier | 4% | <2% |
| Sea | 2% | 3% |
| Air | 1% | <0,5% |

Orifarm Group does not have its own trucks and relies on transportation suppliers. We continuously work with our transport partners on getting further insights into our CO² emissions footprint to establish solid insights into our baseline. Simultaneously, we forward requirements to our transportation partners to identify ways of reducing CO² emissions i.e. we require that our partners only uses drivers that are trained to drive environmentally correct. All of Orifarm Group's transport partners meet the EU standard for equipment efficiency.

Activities planned for 2019 include:

- Using only carbon footprint neutral courier services
- Optimizing transport between our Danish and our Czech site via increased use of new and more aerodynamic trucks and by using larger and thereby fewer trucks
- Reduce need for airfreight due to improved planning processes

Climate and the environment in the supply chain

In our Supplier Code of conduct, we communicate our expectations to our suppliers on responsible business behavior in relation to the environment and climate. Further elaboration on risks, results achieved and future plans for our work on responsible sourcing can be found in the section about responsible sourcing on page 15.

Orifarm Group and the Sustainable Development Goal 12: Responsible consumption and production

12 RESPONSIBLE
CONSUMPTION
AND PRODUCTION



Orifarm Group contributes with:

- Focus on increase sorting of mixed waste to recycle more of the total waste generated
- Continuing to look for ways to optimize planning for reduction of chemical waste
- Safe handling of chemical waste

Orifarm Group and the Sustainable Development Goal 13: Climate action

13 CLIMATE
ACTION



Orifarm Group contributes with:

- Energy optimization strategies at Orifarm locations
- Sustainability considerations such as increasing energy exploration when purchasing new equipment and machinery

Anti-corruption and business ethics

In Orifarm Group it is important for us all to conduct our business with integrity, responsibility and honesty. Orifarm Group respects and behaves accordingly to all antitrust principles in all markets that we do business in. Via membership of the UN Global Compact, we are obliged to work against corruption. We offer full transparency and are compliant with anti-corruption laws and principles.

Main risks

Orifarm Group is working in an international environment and has a varied landscape of business relations across Europe. This leaves Orifarm Group exposed for anti-corruptive behavior in dealings with such a diverse range of business relations.

Anti-corruption policy

Orifarm Group places great emphasis on being a good and competent partner for our stakeholders. Part of this involves working against corruption and to promote good business ethics.

Our anti-corruption effort includes prevention of extortion and bribery and is carried out in compliance with international standards. In our Supplier Code of Conduct our suppliers and business partners are requested to support and respect anti-corruption principles. At the same time we conduct risk assessment and mitigation plans as an integrated part of our business planning and operations.

To support all employees in making ethical decisions in our daily work, we have, in 2018, developed a set of guidelines designed to promote the principles and our business ethics of Orifarm Group. The ethical code of conduct sets directions and promotes our standards of conduct for all employees of all entities of the Orifarm Group.

| | 2018 | Target for 2019 |
|--|------|-------------------------|
| Operations assessed for risk related to corruption | 1 | 8 |
| Training about anti-corruption policies and procedures | 0 | All commercial managers |
| Confirmed incidents of corruption | 0 | 0 |

GRI standard 205_1, 205_2, 205_3

In 2019, we plan education on competition law and compliance for our management and commercial managers.

Anti-corruption in the supply chain

In our Supplier Code of conduct, we communicate our expectations to our suppliers on supporting and respecting anti-corruption principles. Further elaboration on risks, results achieved and future plans for our work on responsible sourcing can be found in the section about responsible sourcing on page 15.

Responsible sourcing

Orifarm Group recognizes that it is not only our own operations that impact societies, but also the companies we engage with. In our *Supplier Code of Conduct* we communicate our expectations to our suppliers on responsible business conduct within human rights, labor rights, environment and anti-corruption. This forms the basis for our dialogue with strategic external stakeholders on meeting our expectations.

With our launch of our CSR policy in 2017, we began to introduce our Supplier Code of Conduct to all our goods and service suppliers in 2018 and more than 65% of our Tier 1 goods suppliers have acknowledged our supplier code of conduct or provided documentation for commitment to CSR. The process continues in 2019.

Main risks in supply chain:

An assessment* of the country or origin of our suppliers as well as our value chain activities identified the following risks in our supply chain

- Risk for abusing human rights and labor rights, for negative impact on climate and environment and for contributing to corruption in following markets: India, Turkey, Thailand, China, Poland, Hungary and Romania.
- Labor rights with our transportation suppliers

2019 Planning

- Continuation of roll out and obtain commitment to our supplier code of conduct across all 1st Tier suppliers.
- Risk screening of selected suppliers in selected risk markets
- Building CSR review in our due diligence of product supplier selection

**Source: EPI 2016, Transparency Int. and US department of State's Human Rights Reports 2016 & US Department of State's Trafficking in Persons Reports 2016.*

Orifarm Group policies

Orifarm Group's corporate social responsibility policy can be found here: [CSR Policy](#)

Orifarm Group's Supplier code of conduct can be found here: [Supplier Code of Conduct](#)

Orifarm Group CSR grievance mechanisms

Orifarm Group provides internal and external stakeholders with the option of reporting illegal or unethical behavior, including behavior and practices that do not comply with the social responsibility of Orifarm Group to respect human rights and labor rights, protect the environment and work against corruption. This can be done at CSR@orifarm.com