

cencora

**2025  
Supplier code  
of conduct**

## About this Code

The Code is intended as a general guide for performing our duties and activities in accordance with sound ethical principles.

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Cencora fosters a positive impact on the health of people and communities around the world by advancing the development and delivery of pharmaceuticals and healthcare products. As a leading global healthcare company, with a foundation in pharmaceutical distribution and solutions for manufacturers, pharmacies, and providers, we create unparalleled access, efficiency and reliability for human and animal health.

As an industry leader with 1,300 locations worldwide, we touch nearly every aspect of the pharmaceutical supply chain and recognize that our responsibility includes conducting our business ethically and with uncompromising integrity. We work hard every day to ensure that all applicable laws, regulations, and industry standards are followed, and we expect the same from our suppliers, agents, vendors, subcontractors and other business partners that provide goods or services to, or on behalf of, Cencora in both domestic and global markets (collectively, our "Suppliers").

This Supplier Code of Conduct ("Code") sets forth the basic expectations with respect to various ethics and compliance matters that Cencora and its subsidiaries and affiliates around the world (collectively referred to as "Cencora") has established for its Suppliers. Nothing in this Code is intended to replace, supersede, or conflict with any applicable legal or regulatory requirement, or any contractual obligation that any Supplier may have with Cencora. It is up to each Supplier to determine how to meet and demonstrate compliance with the principles and standards set forth in this Code.

To reinforce the ethics and compliance standards to which we are committed, Cencora developed this Code based on the Pharmaceutical Supply Chain Initiative's (PSCI) Pharmaceutical Industry Principles, Cencora's Code of Ethics and Business Conduct, and with influence from various international human rights standards, including the 10 Principles of the United Nations Global Compact and UN Sustainable Development Goals.



# Compliance with applicable laws and regulations

**All suppliers must comply with all applicable laws, rules, regulations, codes, treaties, conventions or other legal requirements in the jurisdictions in which they conduct their business, including but not limited to the following:**

**Anti-bribery and anti-corruption laws.** All forms of corruption, bribery and kickbacks are strictly prohibited. Suppliers shall not pay or accept bribes or facilitation payments of any kind or participate in other illegal inducement arrangements in business or government relationships, either directly or through the use of intermediaries. Suppliers shall ensure they have adequate systems in place to prevent bribery and comply with applicable anti-bribery and anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act and U.K. Bribery Act.

**Fair competition.** Suppliers shall conduct their business consistent with fair and vigorous competitive practices and in compliance with all applicable anti-trust and fair competition laws. Suppliers shall employ fair business practices including accurate and truthful advertising.

**Facility and supply chain security.** Suppliers must maintain adequate security at all facilities and implement supply chain security procedures designed to prevent the introduction of non-manifested cargo into outbound shipments (e.g., illicit drugs, explosives, biohazards). Each facility must have written security procedures and maintain documented proof of adequate controls implemented to guard against introduction of non-manifested cargo.

**Licensing.** Where applicable, Suppliers must maintain all necessary licenses, permits, certificates, and other requisite government approvals and registrations for the goods and services they provide to Cencora.

**Import/Export laws.** Suppliers must comply with all applicable import and export controls, sanctions, and other trade compliance laws of countries with jurisdiction over relevant transactions involving Cencora.

**Healthcare fraud and abuse laws.** Suppliers must comply with all applicable U.S. and international healthcare fraud and abuse laws, including those U.S. laws which generally prohibit persons from soliciting, offering, receiving, or paying any compensation to induce someone to order or purchase items or services that are in any way paid for by Medicare, Medicaid or other government funded healthcare programs. These applicable laws also prohibit submitting or causing to be submitted any fraudulent claim for payment to a government.

**Conflict minerals.** Suppliers shall support Cencora in its commitment to reduce and, where possible, eliminate from its supply chain the use of certain minerals known as 3TG that have been determined to have directly or indirectly financed or benefited armed conflict groups in certain areas, including the Democratic Republic of Congo and adjoining countries. Suppliers shall take reasonable steps to track the source of the minerals used in their products.



# Ethics and integrity

**Suppliers shall conduct their business with the utmost integrity and firmly adhere to the following ethical principles:**

**Business records.** Suppliers shall maintain, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements. All financial books and records must conform to the generally accepted accounting principles of the jurisdiction in which the Supplier operates. Records must be legible and transparent and reflect actual transactions and payments in reasonable detail.

**Conflicts of interest.** We expect our Suppliers to avoid all conflicts of interest or situations creating the appearance of a potential conflict of interest in their dealings with Cencora. We expect our Suppliers to provide notification to all affected parties in the event an actual or potential conflict of interest arises. Any potential conflict must be disclosed to Cencora's contractual representative and cleared in advance of proceeding with any relevant business activity.

**Gifts and entertainment.** Suppliers should avoid giving gifts or anything else of value to Cencora team members that might appear to influence, compromise judgment, or obligate those team members in any way to the Supplier. Suppliers may provide business-related meals, refreshments, and/or entertainment to Cencora team members that are occasional, of modest value, in accordance with local country code or policy, and not intended to or could not be reasonably perceived as affecting business decisions. Questions on gifts and entertainment may be directed to Cencora's Office of Compliance at [ooc@cencora.com](mailto:ooc@cencora.com)

**Openness to assessments and audits.** We expect Suppliers to be open and transparent to our assessment of their compliance with our Supplier Code of Conduct.

# Privacy and confidentiality

**Suppliers shall safeguard and make only proper use of confidential information to ensure company, worker, patient, research subject, and donor privacy and legal rights are protected. Suppliers must immediately report any loss, unauthorized use, or improper disclosure of either personal information or Cencora confidential information to Cencora's Office of Privacy ([privacy@cencora.com](mailto:privacy@cencora.com)).**

## Privacy

Suppliers must abide by all applicable data privacy and data security laws and regulations when handling personal information. "Personal information" means any information that identifies, or could be used to identify, an individual and includes, without limitation, names, addresses, email addresses and telephone and fax numbers.

## Confidential information

Suppliers shall not share Cencora's confidential information with unauthorized third parties (including information relating to our products, customers, vendors, pricing, costs, strategies, processes, and practices). Suppliers requiring the exchange of confidential information with Cencora are required to execute a confidentiality agreement with Cencora in advance.

# Labor, safety, and human rights

**Suppliers must uphold the human rights of workers, treat them with dignity and respect, and must not be complicit in human rights abuses. Suppliers must comply with all applicable laws and regulations related to human rights compliance, fair labor practices, and prohibiting slavery, forced labor, child labor, human trafficking, and sexual exploitation.**

**Non-discrimination.** Suppliers shall not discriminate against qualified individuals based on their status as veterans, individuals with disabilities or other protected grounds. Suppliers shall prohibit discrimination against all individuals based on their race, color, age, religion, pregnancy, sexual orientation, gender identity, national origin, union membership, or marital status.

**Freely chosen employment.** Suppliers shall not use forced, bonded or indentured labor or involuntary prison labor. Supplier employees should be free to resign their employment in accordance with local and national laws or regulations without unlawful penalty.

**Child labor and young workers.** Suppliers shall not use child labor in their operations. The term “child” refers to any person under the applicable minimum age for completion of compulsory education, or under the minimum age for employment in any particular country, whichever is the highest. Young workers below the age of 18 shall only be employed in non-hazardous work environments.

**Fair compensation.** Suppliers shall pay workers in accordance with applicable wage laws, including minimum wages, overtime hours, and mandated benefits in any jurisdiction where they operate. Suppliers shall communicate with the worker the basis on which they are being compensated in a timely manner. Suppliers are also expected to communicate with the worker whether overtime is required and the wages to be paid for such overtime.

**Hours of labor.** Suppliers shall comply with all applicable laws and regulations related to fair labor practices and wage and hour issues in any jurisdiction where they operate.

**Substance abuse.** Suppliers shall maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

**Immigration law & compliance.** Suppliers shall comply with applicable immigration laws and regulations in any jurisdiction where they operate and only employ workers with a legal right to work in the relevant location.

**Freedom of association.** Suppliers shall respect the freedom of association. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek collective representation, and join workers’ councils. Workers shall be able to communicate openly with management regarding working conditions without threat of harassment, intimidation, or reprisal.

**Worker safety.** Suppliers shall provide a safe and healthy working environment, including, but not limited to, protecting workers from over exposure to chemical, biological or physical hazards and physically demanding tasks in the workplace and in any company provided living quarters. Suppliers shall ensure appropriate housekeeping and provide workers with access to potable water.

**Identification of concerns.** All Supplier employees should be encouraged to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment. Suppliers shall investigate such reports and take corrective action if needed.

# Environmental stewardship and sustainability

**Suppliers shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible and to engage in activities that reuse and recycle.**

**Environmental authorizations and reporting.** Suppliers shall comply with all applicable environmental regulations. All required environmental permits, licenses, and registrations shall be obtained and their operational and reporting requirements followed.

**Waste and emissions.** Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater or air emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment. This includes managing releases of active pharmaceuticals into the environment.

**Spills and releases.** Suppliers shall have processes and systems in place to prevent and mitigate accidental and diffusive spills and releases to the environment.

**Resource use.** Suppliers shall take measures to improve efficiency and reduce the consumption of resources.

# Management and compliance systems

**Suppliers shall demonstrate commitment to the concepts described in this Code by allocating appropriate resources to managing ethics and compliance risks.**

**Risk Assessment and Risk Management.** Suppliers shall have mechanisms to assess and manage risks in all areas addressed in this Code.

**Emergency preparedness and response.** Suppliers shall identify and assess emergency situations in the workplace and any company provided living quarters, and to minimize their impact by implementing emergency plans and response procedures. Suppliers shall have procedures in place to identify the risks from chemical and biological processes and to prevent or respond to the catastrophic release of biological agents.

**Documentation.** Suppliers shall maintain documentation necessary to demonstrate conformance with these expectations, and in compliance with applicable regulations.

**Training Competency.** Suppliers shall have a training program that educates their employees to make ethical decisions in compliance with applicable laws, regulations and contract requirements and that enables those employees to address these expectations.

**Continual Improvement.** Suppliers are expected to continually improve their ethics and compliance management system by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, audits, inspections and management reviews.

**Commitment and accountability.** Suppliers shall demonstrate commitment to the principles and standards described in this document by allocating appropriate resources and identifying senior responsible personnel.



# Raising concerns

Employees of Suppliers should begin by contacting their own employer to resolve internal ethics and compliance concerns.

Suppliers who believe that a Cencora team member, or anyone acting on behalf of Cencora, has engaged in illegal or otherwise improper conduct should report the matter, unless prohibited by applicable law, promptly to Cencora.

**Cencora provides several resources that allow Suppliers to promptly report a concern in good faith without fear of retaliation:**

**Chief Compliance Officer**

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Cencora

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**Speak up**

Anonymous inquiries and reports:  
[cencoraspeakup.ethicspoint.com](https://cencoraspeakup.ethicspoint.com)



We are united in our responsibility  
to create healthier futures.