

Code of Conduct

Torbay Pharmaceuticals: Code of Conduct

Working responsibly, with purpose and integrity

Introduction

At Torbay Pharmaceuticals, we believe that how we work matters just as much as what we make. As a UK based pharmaceutical manufacturer, we operate with a clear sense of purpose and a deep commitment to doing so ethically, responsibly, and sustainably.

This Code of Conduct sets out the standards we hold ourselves to, and those we expect from the customers and suppliers we work with. It reflects:

- Our legal and regulatory responsibilities (including UK, EU, and international frameworks),
- Widely recognised best practice in ethical business and people management, and
- Our ambition to be a **leading employer and trusted partner** in our industry.

1. Our Shared Principles

We expect all business conducted with or on behalf of Torbay Pharmaceuticals to uphold the following principles:

- **Integrity** in all interactions — fair, honest, and transparent
- **Respect** for people, communities, and the environment
- **Safety and quality** as non-negotiable priorities
- **Compliance** with all applicable laws and regulations
- **Commitment to continual improvement**

2. Respect for People – Being a Leading Employer

At Torbay Pharmaceuticals, we aspire to be recognised as a leading employer, where people are safe, supported, included, and able to thrive. This is a standard we hold ourselves to, and one we actively encourage across our supply chain.

We expect our partners to:

- Uphold **international labour standards**, including the rights set out in the ILO Core Conventions
- Provide **fair pay, reasonable working hours, and safe conditions**
- Ensure **no modern slavery, child labour or forced labour**
- Actively promote **diversity, equality, and inclusion**, and prevent any form of harassment or discrimination
- Respect **freedom of association** and workers' rights to organise

We commit to continually strengthening our own people practices through:

- Regular **employee voice and engagement activity**
- Transparent and fair **people policies**
- Active **learning, development and leadership investment**

We expect our suppliers to **actively engage** in strengthening their own approaches to employment practices, and we are open to working together to support this where needed.

3. Ethical Business Conduct

We expect all parties to:

- Comply with **all relevant laws and industry codes**, including MHRA, EU GMP/GDP, UK Bribery Act, Modern Slavery Act, and data protection law
- Reject all forms of **bribery, corruption, or unethical influence**
- Avoid **conflicts of interest** and disclose any perceived or actual conflicts
- Respect **confidentiality, data privacy and intellectual property**

4. Product Quality, Safety & Compliance

As a pharmaceutical manufacturer, product integrity is at the heart of everything we do. We expect suppliers to:

- Adhere to **Good Manufacturing Practice (GMP)** and/or **Good Distribution Practice (GDP)** standards as appropriate
- Comply with agreed specifications, testing, traceability and reporting protocols
- Proactively identify, escalate and address any quality or safety concerns
- Maintain appropriate certifications, audits, and training for employees

We will continue to strengthen our own systems through robust **Quality Management, continuous improvement** methodologies, and open collaboration with our supply chain.

5. Environmental Responsibility

We all have a role in protecting the planet. We expect all parties to:

- Operate in compliance with environmental law and regulations
- Reduce carbon emissions, minimise waste, and manage hazardous substances responsibly
- Source materials ethically and sustainably
- Innovate for a more sustainable future, including energy efficiency, circularity, and low-impact packaging

We're committed to improving our environmental performance each year, and welcome supplier collaboration in identifying smarter, greener approaches.

6. Monitoring, Reporting & Continuous Improvement

We don't see this Code as a tick-box exercise. It is a living standard that evolves with our business.

What we do:

- Regularly review and refresh our internal people and business practices
- Track employee feedback and external benchmarks to guide progress
- Conduct **supplier assessments** based on risk, regulatory focus, and relationship scale

- Engage in **dialogue and learning** with our supply chain

What we expect:

- Suppliers should be prepared to demonstrate compliance and share evidence where requested
- Any breaches, risks, or concerns should be reported as early as possible
- Suppliers should work with us to resolve issues collaboratively and constructively
- We welcome suggestions from both customers and partners that help us all raise the bar

7. Raising Concerns

Everyone has the right to speak up if something doesn't feel right. We encourage a culture of openness, internally and externally.

Concerns can be raised with your Torbay Pharmaceuticals contact Chief People Officer on 01803 660021.

We will investigate all concerns fairly and sensitively and will not tolerate retaliation against anyone raising an issue in good faith.

8. Conclusion: Raising the Bar, Together

This Code of Conduct represents our shared responsibility to act with integrity, to value people, and to build a better future for our industry and society.

We recognise that perfection is rare, but progress is possible. We invite our customers and suppliers to work with us in the spirit of transparency, learning, and continuous improvement.

Thank you for being part of our journey.