



# GUIDANCE FOR VENDORS AND SUPPLIERS OF PURDUE PHARMA L.P.



PURDUE PHARMA L.P. AND ITS SUBSIDIARY COMPANIES

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**PURPOSE & VALUES**

Purdue and its subsidiary companies are focused on upholding our Purpose and Values in all our decisions, actions, and behaviors.

**COMPASSION** For Patients And **EXCELLENCE** In Science  
Inspire Our Pursuit Of New Medicines



November 2022

Vendors and Suppliers,

Purdue Pharma L.P. and its subsidiaries (“Purdue”)<sup>1</sup> maintain high standards of integrity and aim to apply the highest ethical standards in all business activities. Purdue’s Vendors and Suppliers are an essential part of the overall success of Purdue. Purdue and its Vendors and Suppliers make decisions that impact Purdue’s ability to provide quality healthcare products to its customers.

To reinforce the standards to which Purdue holds both itself and its Vendors and Suppliers, Purdue has created this Guidance for Vendors and Suppliers of Purdue (“Guidance”), reflecting our shared dedication to maintaining Purdue’s Purpose and Values. Our expectation is that our Vendors and Suppliers will, at a minimum, operate in full compliance with all applicable laws, rules, and regulations. Additional resources can be found on the [Ethics & Compliance page](#) of the Purdue internet site.

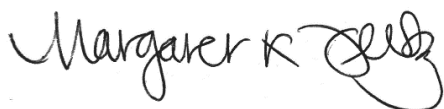
Purdue’s expectation is that each of its Vendors and Suppliers operate in an ethical manner and in compliance with this Guidance. Because our Vendors and Suppliers are an extension of our business, we have many of the same expectations of them as we do of our own employees. We appreciate that you/your organization may have your own set of values and policies in place, however, we ask that you please take the time to understand ours and ensure that they are in alignment with your own.

Purdue has established a mechanism for reporting concerns, the Integrity Helpline. In the case of known or suspected concerns, please feel free to contact:

- A member of the Ethics & Compliance Team at [compliance@pharma.com](mailto:compliance@pharma.com) or
- The Purdue Integrity Helpline: 1-877-787-3831

To the extent possible and when appropriate under the circumstances, efforts will be made not to disclose the identity of an individual who reports a known or suspected violation of law, regulation, or policy. Similarly protected will be the identity of individuals who participate in any investigation. Retaliation against individuals who report issues in good faith is strictly prohibited.

Thank you for taking the time to review this Guidance and please [be in touch](#) with any questions.



Margaret K. Feltz  
Vice President, Ethics & Compliance

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<sup>1</sup> Direct and indirect operating subsidiaries of Purdue Pharma L.P. include Adlon Therapeutics L.P., Avrio Health L.P., Greenfield Bioventures L.P., Imbrium Therapeutics L.P., and Rhodes Pharmaceuticals L.P.

**GENERAL PROVISIONS**

Purdue expects Vendors and Suppliers to follow established practices around Documentation, Training and Business Continuity sufficient to support Purdue's business requirements.

**Documentation**

Vendors and Suppliers shall maintain documentation necessary to demonstrate compliance with Purdue's expectations/requirements outlined in this Guidance, as well as compliance with applicable laws, regulations and standards governing the pharmaceutical industry. Vendors and Suppliers shall maintain record management and retention policies governing documents, information, and records consistent with their industry, applicable laws and regulations and the nature of the work being performed for Purdue. Notwithstanding the above, at a minimum, such documents shall be maintained during the contractual relationship between the Vendor/Supplier and Purdue and for a period of no less than seven (7) years following the expiration/termination of the contract.

**Training and Competency**

Vendors and Suppliers shall train their workers, and as appropriate subcontractors, to achieve an appropriate level of knowledge, skill, and ability to manage and address the expectations set forth in this Guidance. Vendors and Suppliers shall document and retain such training in accordance with the requirements above on Documentation.

Vendors and Suppliers should review training requirements with their Purdue business partner to ensure appropriate training is provided, if necessary, as it pertains healthcare compliance law and policies.

For further guidance, see Purdue's [Healthcare Law Compliance Policies \(HCLC\)](#).

**Investigations**

Vendors and Suppliers shall provide [written notice](#) within 24 hours to Purdue's Ethics & Compliance Department in the event that a federal, state, and/or local enforcement agency and/or regulatory authority investigation is initiated against it related to its business with Purdue and will provide regular written notification regarding the progress and outcome of the investigation.

**Business Continuity**

Vendors and Suppliers are responsible for developing and implementing appropriate business continuity plans for all operations supporting Purdue's business.

**ETHICAL BUSINESS PRACTICES**

Purdue expects Vendors and Suppliers to conduct their business in an ethical manner and to act with integrity.

**Voluntary Injunction**

Vendors and Suppliers should be aware that Purdue is operating under a [Voluntary Injunction](#) and shall take no action to cause Purdue to violate its requirements. One of the central provisions of the Voluntary Injunction is that Purdue is prohibited, directly or through third parties, from promoting opioid medications to health care providers. Purdue therefore requires its Vendors and Suppliers to comply with that provision and not disseminate on its behalf information to health care providers that is either likely or intended to influence prescribing practices of health care providers in favor of prescribing greater amounts, quantities, doses and/or strengths of opioid medications.

**Business Integrity**

In all dealings on behalf of Purdue, Vendors and Suppliers will be honest and accurate, never intentionally make misrepresentations about Purdue, and always comply with applicable federal, state, local and international laws.

**Preventing Bribery and Corruption**

Vendors and Suppliers shall not pay or accept bribes or participate in other illegal inducements in business or government relationships. Vendors and Suppliers shall employ fair business practices. Vendors and Suppliers shall comply with the Foreign Corrupt Practices Act and all other applicable anti-bribery statutes.

**Antitrust**

Vendors and Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable antitrust and competition laws. Vendors and Suppliers must avoid even the appearance of anti-competitive conduct by complying with domestic and foreign antitrust or competition laws. This means that any conversation, understanding or agreement to fix prices, split territories, markets, or customers, participate in bid rigging or other anti-competitive behavior is prohibited.

For further guidance, see [Antitrust Policy](#).

**Interactions with Healthcare Professionals (HCPs)**

In interactions with HCPs, institutions, advocacy groups, and patients, Vendors and Suppliers must follow both the letter and the spirit of the law, conducting all interactions ethically and in compliance with applicable laws, regulations, guidelines, and industry codes and standards.

Our Company is required to disclose various types of information to government agencies. As our Vendor/Supplier, if you make payments to third parties on our behalf, this information may

be reportable. We require that you comply with our data transmission requirements and timelines.

For further guidance, see [Healthcare Law Compliance Policies \(HCLC\)](#).

### **Product Communication**

Vendors and Suppliers should only provide information about Purdue's products when authorized to do so. This includes communications about our products in person or through written material, and delivered through any channel, including the internet.

To the extent a Vendor/Supplier is authorized to discuss Purdue products, that Vendor/Supplier must follow the highest ethical standards, keeping discussions truthful, not misleading, and fair and balanced. Likewise, all discussions must be consistent with the product label or messaging and materials approved through Purdue's Material Review Process.

### **Clinical Trials**

When engaged in clinical trials on Purdue's behalf, Vendors and Suppliers are expected to do so in accordance with all applicable guidelines, federal, state, and local laws, and regulations, as well as stringent medical, scientific, and ethical principles.

### **Adverse Event and Product Complaint Reporting**

- When engaged on behalf of Purdue, Vendors and Suppliers who learn of an adverse event or product complaint pertaining to a Purdue product (or a product with an unknown manufacturer with the same active ingredient as a Purdue product) are required, within 24 hours of learning the information, to follow all procedures regarding the forwarding of adverse drug events and product quality complaints to Purdue. For Adverse Events, please do one of the following:
  - Send an email to [AEReport2@pharma.com](mailto:AEReport2@pharma.com)
  - Call Purdue's Drug Safety Line at 888-726-7535, Prompt 2
- For Product Complaints, please do one of the following:
  - Send an email to [ProductComplaints@pharma.com](mailto:ProductComplaints@pharma.com)
  - Call Purdue's Drug Safety Line at 888-726-7535, Prompt 3

For further guidance, see [Healthcare Law Compliance Policies \(HCLC\)](#).

### **Animal Welfare**

Animals should be treated humanely minimizing pain and suffering. Animal testing should be performed using the fewest number of animals and in a way that minimizes distress. Alternatives should be used whenever scientifically valid and acceptable to regulators.



**Conflicts of Interest**

Vendors and Suppliers must avoid transactions or relationships that are or appear to conflict with Purdue business. Purdue and its suppliers are expected to use good judgement and to avoid situations that can lead even to the appearance of a conflict of interest.

Vendors and Suppliers that do business with Purdue shall not have any competing interest that may interfere with their ability to make objective decisions to act in the best interest of Purdue. All Vendors and Suppliers shall notify Purdue immediately in the event of a potential or actual conflict of interest by sending an email to [compliance@pharma.com](mailto:compliance@pharma.com).

**Supplier Diversity**

Vendors and Suppliers shall engage in sourcing activities that support equal opportunities and diverse candidates.

**INFORMATION ACCURACY AND PROTECTION**

Vendors and Suppliers have a duty to protect Purdue's confidential and proprietary information and must demonstrate compliance with Information security standards and common technical security requirements while supporting activities undertaken on behalf of Purdue.

**Confidential and Personally Identifiable Information Management**

Vendors and Suppliers shall safeguard and make only proper use of Confidential Information in accordance with the confidentiality terms of their contracts with Purdue, applicable laws, regulations standards and Purdue requirements. Confidential Information includes business information of a proprietary nature not known to the public. In addition, Vendors and Suppliers shall safeguard Personally Identifiable Information ("PII") in accordance with federal, state, and local laws and regulations governing privacy such as the Health Insurance Portability and Accountability Act (HIPAA), and the California Consumer Privacy Act (CCPA) and the General Data Protection Regulation (GDPR). Vendors and Suppliers must ensure that Confidential Information and PII entrusted to the Vendor/Supplier is protected at all times. Vendors and Suppliers shall assist Purdue in complying with data privacy laws including any request by a Purdue consumer exercising its right to request access to, or deletion of its PII under applicable privacy laws.

For further guidance, see [Data Privacy and Protection of Personal and Confidential Information](#).

**Information Security**

Vendors and Suppliers are responsible for maintaining appropriate information security for transmitted, stored, and processed data in support of Purdue's business. Vendors and Suppliers must comply with federal, state, and local information security standards as well as Purdue's internal information security standards (e.g., End Point, strong authentication processes commensurate with risk; encryption; vulnerability management program; security testing; security awareness). Vendors and Suppliers must comply and cooperate with any information security assessment conducted by Purdue to ensure due care of Purdue's information assets.

**COMPLIANCE WITH LABOR LAWS**

Vendors and Suppliers shall be committed to uphold the human rights of their employees and treat them with dignity and respect.

**Freely Chosen Employment**

Vendors and Suppliers shall not use forced, bonded, involuntary, slave or indentured labor.

**Child Labor and Young Workers**

Vendors and Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment, or the age established for completing obligatory education.

**Non-Discrimination and Anti-Harassment**

Vendors and Suppliers shall provide a workplace free of harassment and discrimination. Vendors and Suppliers shall not discriminate for reasons such as race, color, age, sex (including pregnancy, childbirth, or related medical conditions), sexual orientation, gender identity, national origin, physical or mental disability, genetic information, religion, political affiliation, union membership, veteran or marital status, disability or any other characteristic protected by federal, state, or local laws, rules, or regulations. Retaliation in any form against an individual who reports a violation of law or regulation, or against an individual who assists in the investigation of a reported violation, is prohibited.

**Anti-Trafficking of Persons and Slavery**

Vendors and Suppliers through whom Purdue conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.

**Fair Treatment**

Vendors and Suppliers shall provide a workplace free of harsh and inhumane treatment, including any sexual or other harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.

**Wages, Benefits and Working Hours**

Vendors and Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Vendors and Suppliers shall, in a timely manner, communicate with workers the basis on which they are being compensated. Vendors and Suppliers are also expected to communicate with workers whether overtime is required and the wages to be paid for such overtime.

**Freedom of Association**

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Vendors and Suppliers shall respect the rights of workers, as required by local laws, to associate freely, join or not join labor unions, seek representation, and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without retaliation, threat of reprisal, intimidation, or harassment.

**SAFE WORK ENVIRONMENT**

Vendors and Suppliers shall provide a safe and healthy working environment.

**Worker Protection and Safety**

Vendors and Suppliers shall operate in compliance with all applicable health and safety regulations and ensure safety management systems are in place to prevent work-related personal injuries.

Vendors and Suppliers shall take reasonable measures to protect workers from overexposure to chemical, biological, physical hazards, and physically demanding tasks.

**Process Safety**

Vendors and Suppliers shall have programs in place to prevent or mitigate incidents associated with operations and processes that could result in catastrophic impact to people or the environment.

**Emergency Preparedness and Response**

Vendors and Suppliers shall identify and assess emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures.

**Hazard Information**

Vendors and Suppliers shall make available safety information relating to hazardous materials in the workplace to educate, train, and protect workers from hazards.

**Environmental Authorizations**

Vendors and Suppliers shall comply with all applicable environmental laws, regulations, codes, and other governmental requirements and authorizations. Vendors and Suppliers shall obtain and follow all associated operational and reporting requirements of required environmental permits, licenses, information registrations and restrictions.

**Waste and Emissions**

Vendors and Suppliers are expected to have systems in place to ensure the safe handling, movement, storage, recycling, reuse, and/or management of waste, air emissions and wastewater discharges. Any waste, wastewater, or emissions with the potential to adversely impact human or environmental health should be appropriately managed, controlled and treated prior to release into the environment.

Vendors and Suppliers must comply with all federal, state, and local laws and regulations regarding waste and emissions.

**MAINTAINING QUALITY AND THE SUPPLY CHAIN**

Vendors and Suppliers shall provide products and services of the highest quality to protect the health and safety of patients and consumers.

**Product Quality**

Vendors and Suppliers involved in the supply, manufacturing, packaging, testing, storage, and distribution of materials and/or products on Purdue's behalf will ensure compliance with applicable Quality regulations and current Good Manufacturing Practice and current Good Laboratory Practice requirements for the markets in which the products are registered and distributed.

**Supply Transparency**

Upon request, Vendors and Suppliers shall provide information regarding their supply chain to support Purdue's compliance with manufacturing practices, regulatory requirements, regulatory agency expectations, disclosure responsibilities and policies and Purdue's other legitimate business purposes. Vendors and Suppliers will comply with all applicable federal, state, and local laws and regulations including the California Supply Chain Transparency Act.

**Supply Disruptions**

Vendors and Suppliers shall inform Purdue of financial, economic, supply changes or other material conditions that affect or might affect the ability to supply Purdue or Purdue's ongoing operations or operating decisions.

**Supply Chain Security**

Purdue maintains membership in supply chain security programs that require Purdue, and their supply chain partners to meet or exceed acceptable warehouse, transportation, and cargo security standards. Supply chain partners may be subject to audit for the purpose of validating Purdue's supply chain security profile. In the event of an audit, Vendors and Suppliers must participate and cooperate fully with Purdue and assist Purdue in all audit needs and inquiries.