



Supplier Code of Conduct

ENTER 

Introduction



At Galapagos, we firmly believe that acting as a responsible and sustainable business is key to our success as we continue to focus on the needs of the patients who trust and depend on us.

Our carefully selected supply chain and network of external business partners play a key role in helping us to “make it happen” and we therefore hold them to the same high ethical standards as those which we apply to ourselves.

As a signatory to the UN Global Compact, we seek to partner with suppliers who share our values and who agree to conduct their operations in a way that is aligned with these principles. Our specific expectations are set out within this Supplier Code of Conduct and our supplementary policies and procedures.



CHAPTER 1

First and foremost we work with and for **patients**. They are our first consideration in every decision we make. ➡

CHAPTER 5

We believe that there is strength in individuality and diversity. **We do not tolerate harassment or discrimination** of any kind. ➡

CHAPTER 2

We are proud of the way we do business. We are **ethical**. We are **honest**. We are **transparent**. ➡

CHAPTER 4

We show courage in the face of adversity. We **speak up** for what is right and we **listen** when someone speaks. ➡

CHAPTER 3

We are **responsible** corporate citizens. Our actions are **thoughtful** and **considered**. ➡



Chapter 1

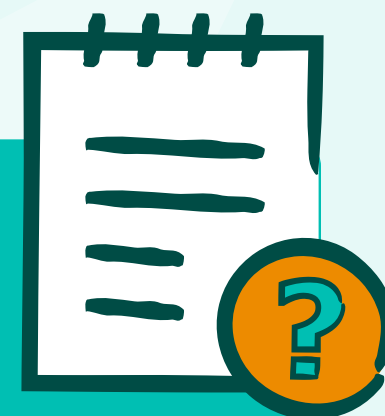
First and foremost we work with and for *patients*.

They are our first consideration in every decision we make.

We put patients first. Always.



NEED MORE GUIDANCE?



Patient Partnership Charter [here](#) 

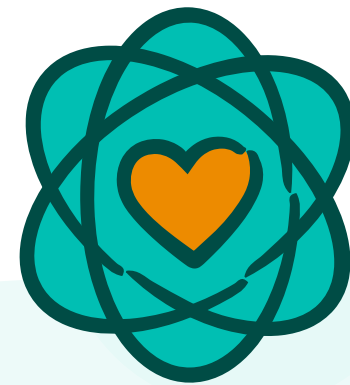
Galapagos not only imagines a better future for patients but we work consistently to make it happen, by prioritizing humanity and quality. Patients are our North Star, their unmet needs are our motivation. We expect our suppliers to put patients first and to provide goods and services of high quality in a reliable and timely manner. We expect our suppliers to help us do this in the right way to help us achieve meaningful and lasting results.

- ✓ Whether in relation to clinical studies, research and development or working with our partners, such as Healthcare Professionals or Patient Organizations, the safety and wellbeing of patients comes first
- ✓ We listen to patients, to better understand their needs and preferences. We treat patients with empathy, compassion, and care. Any information shared about our products, at any stage of development, must be accurate, balanced, fair, objective, and substantiated
- ✓ Complaints or concerns that we receive about our products will be dealt with as a matter of urgency
- ✓ We recognize the trust that patients place in us. We only collect or use their information for valid reasons and are transparent about the purpose for which we are doing this
- ✓ We always protect patient privacy and data

Chapter 2

We are proud of the way we do business. We are *ethical*. We are *honest*. We are *transparent*.

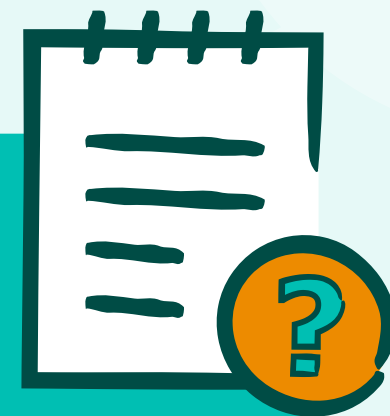
We act with *integrity* in everything we do.



NEED MORE GUIDANCE?

ABAC Policy [here](#) →

Identifying & Declaring Personal Interests [here](#) →



Galapagos recognizes the harm that unethical business practices such as bribery and corruption cause, often to the most vulnerable people in society. Our suppliers are expected to behave ethically and with integrity in all business transactions and our position is simple:

- ✓ Our suppliers shall not offer, give, demand, or accept any financial or other favor to, or from, any person to obtain an unfair advantage. It does not matter what the situation is, who is involved, or the value. We expect our suppliers to apply the same standards throughout their supply chain
- ✓ Suppliers must understand that conflicts of interest can be damaging to Galapagos and to our individual reputations. Therefore, our suppliers must exercise good judgment to avoid situations where there may be, or even appear to be, an actual or potential conflict between their personal interests, and the interests of Galapagos
- ✓ Where it is not possible to avoid a potential conflict, this must be disclosed to Galapagos so that together, we can discuss how it can be managed appropriately and transparently

Animal welfare is important to Galapagos and therefore non-animal alternative methods should be used whenever possible in the conduct of our activities. When animals are needed, only the most humane methodologies should be used on the smallest number of animals necessary to obtain the required information. For our suppliers this means:

- ✓ Animals shall be treated respectfully, with pain and stress minimized
- ✓ Suppliers should seek opportunities to reduce the need for animal testing by use of innovative analytical methods, reducing the number of animals used, or by refining procedures to minimize distress. Alternatives should be used wherever these are scientifically valid and acceptable to regulators
- ✓ To protect animals in service to life-saving innovation, we expect suppliers to implement the 3R principles (Replacement, Reduction and Refinement) and prioritize oversight and transparency regarding their obligations to animal welfare
- ✓ Any such methodologies and procedures should be continuously improved to limit pain, suffering and distress experienced by animals

Chapter 3

We are responsible corporate citizens. Our actions are thoughtful and considered.

We hold each other accountable.



NEED MORE GUIDANCE?

The Ten Principles of the UN Global Compact [here](#)

Galapagos acts in accordance with the prudent person principle, we make decisions which are risk-based and apply common sense to better build trust with our stakeholders.

- ✓ We play fair and expect our suppliers to do the same, always respecting the standards for fair competition
- ✓ We expect honesty and transparency from our suppliers in all interactions, including a commitment to never share information that is misleading, unbalanced, or inaccurate
- ✓ Suppliers must comply with all applicable laws, regulations, and industry ethical codes, specifically committing to:
 - ✓ Not engaging in, or supporting, any form of child labor. Any employment should comply with the minimum age of employment defined in each country. In addition, for any hazardous work, the minimum age of employment shall be no lower than 18 years of age regardless of local law
 - ✓ Preventing forced labor – enabling employees to freely chose employment or leave employment in accordance with established criteria and having appropriate wages, benefits and working hours

- ✓ Allowing employees, the freedom to establish and join groups for the promotion and defense of their occupational interests
- ✓ Putting in place proportionate measures to ensure and demonstrate such compliance
- ✓ Suppliers must comply with all laws and regulations related to employee health, safety & wellbeing and commit to minimizing any negative environmental impact their operations may have and to actively reduce their environmental footprint
- ✓ Environment, health, and safety (EHS) is everyone’s responsibility; and we actively share our ambition to continuously improve in these areas. We expect the same standards of behavior from others acting on behalf of Galapagos or forming part of our supply chain
- ✓ Stakeholders trust and rely on Galapagos to process their data in a respectful and compliant way and to protect their privacy and confidential information. We therefore expect our suppliers to uphold that principle, complying with all applicable laws and regulations regarding data privacy, including the GDPR

Chapter 4

We show courage in the face of adversity. We *spe*ak up for what is right, and we *listen* when someone speaks.



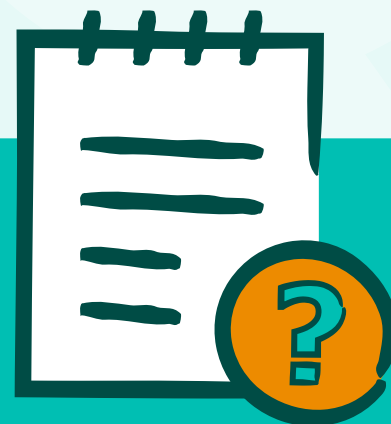
At Galapagos we expect people to raise questions, issues and concerns early. This means we also need to know if a supplier encounters a problem which may impact Galapagos.

- ✓ Suppliers are expected to establish mechanisms to enable their employees and others within their supply chain to bring forward issues or concerns relating to business activities
- ✓ Such mechanisms must protect those who raise concerns in good faith from all forms of retaliation
- ✓ In the absence of an internal mechanism which enables anonymous reporting, in relation to the work undertaken on behalf of Galapagos, suppliers are expected to encourage their employees to utilize Speeki, the Galapagos platform for raising a concern

NEED MORE GUIDANCE?

Galapagos Code of Conduct [here](#) ➔

Speeki Reporting Platform [here](#) ➔



OPEN SPEEKI ON YOUR PHONE

Scan the QR Code ➔



Chapter 5



We believe that there is strength in individuality and diversity.

We do not tolerate harassment or discrimination of any kind.

We foster a diverse and inclusive organization and protect each other against all forms of discrimination and harassment.

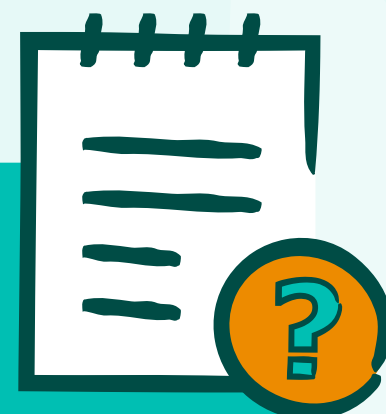
At Galapagos we treat one another as we'd wish to be treated, with equity, respect and dignity, enabling everyone to contribute fully and enjoy equal opportunities within the company. We are growing a diverse and inclusive workplace, where people can be their whole and best selves and in which every one of us feels a sense of belonging and community. Whether in relation to race, gender or gender identity, sexual orientation, age, nationality, religion, disability, appearance, political opinion, national extraction, social origin, trade union membership, or anything else, we stand united against all forms of harassment or discrimination.

The right to freedom from discrimination and harassment extends to all of us. Therefore, we take care to select suppliers with whom we work to ensure that they also uphold these standards.

We expect our suppliers to commit to upholding this principle of non-discrimination and harassment, wherever in the world they operate both directly and within their supply chain.

NEED MORE GUIDANCE?

Anti-Discrimination & Anti-Harassment Policy [here](#) ➔





Call to Action

As a Galapagos supplier, we ask you to make things happen but only in the right way:

- ✓ You must commit to keep this Code close to hand, to guide you if you are unsure
- ✓ If you can't find the answer you need in this Code, you will ask Galapagos for support
- ✓ You understand that there may be other policies, procedures and guidelines that are relevant to the work you do for Galapagos
- ✓ You will ensure all your relevant team members and employees read and apply all applicable policies, procedures and guidelines because you understand that they exist to protect you, Galapagos and the patients and societies we all serve