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**CSL LIMITED**

**OUR CODE OF  
RESPONSIBLE BUSINESS PRACTICE**

**JULY 2017**

**CSL™**

# OUR CODE OF RESPONSIBLE BUSINESS PRACTICE

PATIENT FOCUS • INNOVATION • INTEGRITY  
COLLABORATION • SUPERIOR PERFORMANCE

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DEAR CSL COLLEAGUES

**I AM PLEASED TO INTRODUCE OUR THIRD EDITION OF CSL'S CODE OF RESPONSIBLE BUSINESS PRACTICE (THE CODE). LIKE OUR FIRST TWO EDITIONS, THIS IMPORTANT PUBLICATION HAS BEEN APPROVED BY THE BOARD AND CARRIES OUR FULL SUPPORT AND COMMITMENT.**



With each edition of our Code we account for a growing organisation, both in employees and geographic reach. The Code critically sets out the rights and obligations we have individually as employees and affirms our commitment to our stakeholders for the highest standard of conduct in all that we do.

When it was founded more than a century ago, CSL made a promise to save lives and protect the health of Australians. Today, that very same promise is stronger and more vibrant than ever around the world, with more than 17,000 employees across the globe and our life-saving products in over 60 countries. Our Values are the foundation and our Code the guideline for how we conduct business and deliver on our promise to patients, partners and other stakeholders.

I encourage you to review the Code and understand how it impacts you, your role and the way in which you represent CSL in business and the wider community.

Our success and the promise we make to patients is built on your commitment to strengthen and protect our company and its reputation.

**PAUL PERREAULT**  
**CEO & MANAGING DIRECTOR**  
**CSL GROUP**





# 1

## COMPANY VALUES AND GUIDING PRINCIPLES







## OUR CODE OF RESPONSIBLE BUSINESS PRACTICE

PATIENT FOCUS • INNOVATION • INTEGRITY  
COLLABORATION • SUPERIOR PERFORMANCE

Our Values bind the CSL group of companies together through a shared commitment to:

### **PATIENT FOCUS**

We deliver on our promise to patients

### **INNOVATION**

We turn innovative thinking into solutions

### **INTEGRITY**

We walk the talk

### **COLLABORATION**

We are stronger together

### **SUPERIOR PERFORMANCE**

We take pride in our results



## COMPANY VALUES AND GUIDING PRINCIPLES CONTINUED

## This Code of Responsible Business Practice (Code) sets out the principles of conduct that underpin our Values:

- Conducting CSL's business with the utmost integrity by complying with all applicable local laws and regulations in all countries in which we operate, and by fulfilling all of our responsibilities to shareholders and the financial community;
- Rules guiding employees and directors towards ethical decisions in situations of potential conflict of interest, political involvement, bribery and financial inducements;
- Generally accepted workplace relations principles including mutual respect, non-discrimination and freedom of association;
- The quality of our products and the safety of our patients, plasma donors, employees and third parties by adherence to health and safety standards, through compliance with manufacturing and other best practice standards, and through provision of safe work environments;
- Supporting innovation through investment in research and development focused on new and improved products, and across all aspects of our business, to help improve patients' lives;
- Contributing to the development of public policy in our areas of expertise;
- Responsible environmental practices that minimise our environmental impacts; and

- Guidance for creating and maintaining beneficial relationships with all the communities in which we operate.

CSL aspires to maintain high standards of business practice and be a responsible employer and this Code is intended to set out the minimum standards applicable to our employees across the world. CSL's legal obligations will be consistent with those that are applicable under local laws.

This Code, along with supplementary policies and procedures, has been developed to help ensure that:

1. Our customers and the broader community can be confident that CSL is committed to operating with the highest integrity at all times;
2. Our third parties (e.g. contractors, suppliers, distributors) know what to expect from a business relationship with CSL and the expectations we have of them; and
3. Our employees understand both their obligations to CSL and CSL's obligations to them.

All of us have a responsibility to ensure that the role we perform in carrying out CSL's business is a constant reflection of these principles and the values of the organisation.



## Making Good Decisions

An integral part of responsible business practice is making good decisions. When faced with a decision, you should consider the following:

- **The Policy Test** – Is my proposed action consistent with this Code and other CSL policies?
- **The Legal Test** – Is my proposed action legal? Does it conflict with any applicable law or regulation?
- **The Values Test** – Is my proposed action consistent with CSL's values? Is it ethical and honest?
- **The Mirror Test** – What are the consequences of my proposed action? How will I feel about myself if I take the action?
- **The Others Test** – What will others think about my proposed action?
- **The Media Test** – Would I be concerned if there was a headline of my proposed action in the media?

If after you have considered these points, you have any doubts about a decision you are faced with, you should discuss the decision you face with your supervisor/manager. In addition, if you believe there is a potential breach of CSL policy and/or procedures, you should discuss the matter with your supervisor/manager. Refer to sections 7.1 and 7.2 for the Framework of Responsibility and Raising Concerns respectively.

## Q&A

**Q.** I would like further information on aspects of the Code. How do I get further information?

**A.** *Further guidance is provided by the specific CSL policies and support tools which are referenced throughout the Code and available on CSL's intranet. Local policies and standard operating procedures may also be applicable. If you still have questions or concerns it is important that you raise them with your supervisor/manager. You can also contact CSL Compliance, CSL Legal or CSL Human Resources (HR) for further information on the Code.*

## Q&A

**Q.** I am a contractor at CSL. How does the Code apply to me?

**A.** *CSL's Code applies to all employees and any third parties who provide services to or on behalf of CSL. We expect our third parties to comply with the applicable local laws and regulations of the countries in which they operate, and to conduct business in a manner that is consistent with this Code.*



# 2

## BUSINESS INTEGRITY

### **CSL's Commitment:**

At CSL, we are committed to conducting all aspects of our businesses in an ethical and transparent way. We deliver this through our unwavering commitment to compliance with all applicable local laws, regulations, guidelines and pharmaceutical industry standards and codes of conduct in the countries where we operate.

## OUR CODE OF RESPONSIBLE BUSINESS PRACTICE

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### We will:

- Expect that all our employees comply with all applicable laws, regulations, guidelines, standards and codes wherever we operate;
- Ensure that management systems are in place to support compliance with all applicable laws, regulations, guidelines, standards and codes;
- Ensure that all our employees understand their obligations with specific reference to the way they carry out their responsibilities every day; and
- Measure and manage business outcomes and apply the principles of continuous improvement to enhance our responsible business practices.

## 2 BUSINESS INTEGRITY CONTINUED

### 2.1

#### Risk management

Risk management is an integral element of CSL's overall corporate governance framework. We maintain a structured, consistent, enterprise-wide approach to risk management to help enhance the performance of our businesses. We have a collective responsibility to integrate risk management into our culture and into all our processes at every level.

CSL has adopted the Australia/New Zealand Standard ISO31000; 2009 (Risk Management Principles and Standards) as the basis of our co-ordinated global risk management process. CSL's implementation of risk management is detailed in the CSL Group risk framework.

This framework plays an important role in ensuring that we have adequate controls to mitigate the risks that could impact on our ability to meet our business and financial goals.

### 2.2

#### Compliance with laws & regulations

At CSL, each employee is responsible for complying with the applicable local laws of the countries in which we operate.

In certain aspects of our business, such as the marketing of our products, our relationships with other healthcare professionals and our research and development, we have made further commitments to comply with both local and internationally accepted pharmaceutical industry codes of conduct.

We expect third parties with which we work to comply with the applicable local laws and regulations of the countries in which they operate, and to observe all of the principles set out in this Code.

## Q&A

**Q.** I am responsible for sales and marketing of certain CSL products across a number of different countries. How do I ensure that I and my teams comply with applicable laws and regulations?

**A.** *Wherever we operate CSL must comply with applicable national and local laws and regulations. These may vary from place to place, as different countries have different legal requirements. CSL Legal may be contacted for advice on local legal requirements for each country.*

*Should the applicable local legal requirements be less stringent than the Code in any aspect, then you must still follow the principles of the Code. You must also ensure that you comply with any applicable pharmaceutical industry standards and codes of conduct.*

## 2.3

### Internal controls and reporting

Accurate and complete business records are essential for the effective management of our business and to maintain investor confidence.

At CSL, we are committed to ensuring the integrity and quality of our business record keeping and that all of our business records are created and managed to give a fair, true and accurate account of our business.

We have internal control systems to ensure financial statements comply with the applicable local laws of the countries in which we operate and to prevent fraud and other improper conduct.

## Q&A

**Q.** I have been requested to undertake a review of all the records and draft documents I am holding. How should I decide what to dispose of and what to retain?

**A.** *The CSL Global records retention schedule establishes how long different types of information need to be retained. In general, you should dispose of records meeting or exceeding their retention periods. Two classes of records which must be retained are those which are the subject of a legal "hold order" or those considered to be "historical records". Further information is available from your site's Records Manager and in the CSL Global records management policy and any specific local records management policy or standard operating procedure.*

## 2 BUSINESS INTEGRITY CONTINUED

### 2.4

#### Protection of assets and information

CSL facilities, equipment and other assets must be well maintained and secured appropriately against theft, misuse and unauthorised disclosure. As a result, each CSL employee is responsible for ensuring the protection of our assets and information.

The management of our information technology ensures that our information assets are protected and held secure from a wide range of threats to ensure business continuity and minimise business risk. CSL's information technology security management is based on ISO 207001 and 207002.

Electronic equipment is primarily provided to employees to support CSL business objectives and employee responsibilities. Only software that is endorsed and supported by CSL may be installed on a CSL provided electronic device that has direct access to our critical business systems. All data and communications that relate to CSL's business and are created and/or stored on a CSL provided electronic device are the property of CSL.

It is the responsibility of each employee to ensure our information is secure. CSL recognises that internet use is widespread and has numerous benefits to both CSL and the employee or those providing services to or on behalf of CSL. All online communications including the use of social media must adhere to the same principles and guidelines that apply to all other employee activities as referenced in CSL's policies.

## Q&A

**Q.** I just noticed a colleague who works in the next workstation looking at pornographic material on his computer at lunchtime. I don't find the images offensive, he's a good worker and does his job well. What should I do?

**A.** ***Pornographic material is not allowed on CSL systems in any form and is a misuse of CSL property. The fact that your colleague is a good worker and the activity occurs during lunchtime are not relevant. You must report this to your supervisor/manager so that appropriate action can be taken.***

## 2.5

### Continuous disclosure

Online activity must not disclose information that could be considered trade secrets or are otherwise confidential or proprietary to CSL. Personal use of the internet is permitted within the CSL work environment provided that it does not interfere with the performance of the employee's job, it is done in the employee's personal time (breaks, etc.) and it does not access or send any material in violation of any applicable law or which is damaging to a person's or CSL's reputation, or which may be considered offensive or inappropriate by normal community standards.

We apply filters to CSL electronic equipment to prevent access to web sites of inappropriate content. However, as it is impossible to identify and limit access to all inappropriate websites, each employee should be mindful of the sites they access.

We have the ability to monitor internet, application, and internal network use. We reserve the right to use this capability to protect CSL from criminal or inappropriate activity as well as to ensure that employees perform their duties consistent with CSL policies. In all cases we will ensure that data privacy is maintained in compliance with local laws and regulations.

Any equipment or other assets (including laboratory notes and notebooks) owned or leased by CSL shall remain the property of CSL and upon termination of employment, or upon request by CSL management, must be returned to CSL.

As a publicly listed company on the Australian Securities Exchange (ASX), CSL has obligations under Australian law and the ASX Listing Rules.

Subject to limited exceptions, we must continuously disclose to the ASX information about CSL that a reasonable person would expect to have a material effect on the price or value of CSL securities.

We have a policy that sets clear guidelines and describes the actions that the directors and all employees should take when they become aware of information that may require disclosure.

## Q&A

**Q.** Regarding CSL's use of application and network monitoring - does this mean that CSL is watching everything I do?

**A. No. CSL has the capability to recall and review all email and electronic traffic. We use this capability, subject to applicable laws, to detect criminal behaviour and behaviour that is inconsistent with CSL policy, such as the accessing or sending of pornography or other offensive or inappropriate material.**



## 2 BUSINESS INTEGRITY CONTINUED

### 2.6

#### Trading in securities

At CSL, we encourage all of our directors and employees to be long-term holders of CSL shares. However, we must take care over the timing of the sale or purchase of any such shares.

Insider trading laws prohibit directors or employees from buying or selling CSL shares, where they are in possession of price-sensitive information that is not generally available to the market.

Price-sensitive information could include:

- The financial performance of CSL against budgets or forecasts;
- Entry into or termination of a significant contract;
- Actual or proposed mergers, acquisitions or joint ventures; or
- Progress of significant research and development projects against milestones.

We have a policy that helps directors and employees to fully understand their obligations in relation to insider trading, with particular emphasis on trading in CSL securities.

Insider trading is a criminal offence under Australian law.

## Q&A

Q. My parents manage a share portfolio as part of their retirement savings. They have asked my advice on whether they should buy some CSL shares. I am aware that CSL has a number of new products in the pipeline and that research has proceeded well in the last year. Am I able to discuss this with my parents and to encourage them to invest in CSL?

**A. *CSL employees are prohibited from trading in CSL shares if they are in possession of price sensitive information that is not generally available to the market. This prohibition extends to encouraging others to trade in CSL shares on the basis of such information. Ask yourself the following question: Do you possess information about CSL's research program or other business activities or plans which has not been released publicly through media or securities exchange releases and which, if known, would be likely to influence an investor's decision to buy or sell CSL's shares? If yes, you must not advise your parents on whether or not to trade in CSL shares. If no, you may advise your parents and they are free to trade. In the absence of your advice, your parents are free to trade.***

## 2.7

### Competition

Compliance with trade practices and competition law is fundamental to our integrity and good reputation.

CSL supports the principle of free competition and forbids practices that would in any way:

- Mislead consumers or restrict access to therapies;
- Result in pricing that would be in contravention of applicable trade practices or competition laws;
- Gather competitive intelligence other than in a manner that is ethical and in compliance with all laws and regulations; or
- Constitute other unfair practices.

We have compliance training programs in place to ensure that relevant employees understand their own and CSL's obligations in relation to applicable trade practices and competition laws. We have also created systems for identifying, communicating, reporting, investigating, and resolving any non-compliance with such laws, and regularly reinforce employee awareness of options to raise concerns.

Breach of trade practices and competition laws can result in serious consequences for CSL and employees, including substantial fines and imprisonment, and is regarded by CSL as serious misconduct, which may lead to disciplinary action up to and including termination.

## Q&A

**Q.** When attending international conferences, I sometimes encounter former colleagues, who work at competitor companies. During a coffee break at one recent meeting, a former colleague began to talk about difficulties his company was having in preparing a tender for the supply of pharmaceuticals to a government agency. She sought my advice knowing that CSL has been successful in this area in the past. Is it permissible for me to provide general advice to my colleague?

**A.** *You must never engage with competitor companies in discussions on tenders as to which CSL has been, is or may be involved. Related issues which could arise, such as pricing policy, manufacturing capacity and strategy, and profit margins, are very sensitive and must always be avoided. If conversation follows this path, you must remove yourself even if you are not a contributor to the discussion. It is important that CSL employees not only comply with trade practices and competition laws but also avoid any perception otherwise.*

## 2 BUSINESS INTEGRITY CONTINUED

### 2.8

#### Conflicts of interest

In carrying out their responsible duties at CSL, all directors and employees are expected to put the interests of CSL ahead of their private interests. A conflict of interest can occur where an employee's personal interests may compromise or put at risk an employee's obligation to faithfully serve the interests of CSL.

Importantly, it is not necessary for such a compromise to have occurred before the situation can be identified as a conflict of interest. The perception of a conflict of interest in a situation can be enough for an employee's professional reputation and decision making ability to be compromised or questioned.

This includes, but is not limited to, situations in which:

- A private interest (financial or otherwise) could conceivably influence an employee's judgment in handling CSL business;
- An employee's allegiance to immediate family or any third party, group or organisation is regarded as competing with the interests and concerns of CSL;
- An employee has an interest in a transaction in which it is known that CSL has or may have an interest;

## Q&A

**Q.** As a CSL site manager I am seeking a contractor to provide training on health and safety procedures to employees and visitors to the site. My husband is a professional health and safety trainer who is widely recognised for his experience and capability in this area and his rates are fair. Is it ethical for me to offer him the work?

**A.** *If you offer the service procurement contract to your husband you, as the nominated decision maker, may put yourself in a position of having to choose between your support to your husband and CSL's business interests. This is a clear conflict of interest. Even if it were not, the situation may be perceived by others to be a conflict. Should you wish to pursue the matter, you must notify your supervisor/manager declaring the conflict of interest and not proceed with offering your husband the contract unless and until you have documented authorisation for managing the process.*

- An employee receives fees, commissions or other compensation from a supplier, a competitor or customer of CSL; or
- An employee uses their time, equipment, supplies or efforts for something other than CSL-approved activities, programs or purposes.

In these situations, or where there is a doubt as to whether a conflict of interest exists, employees must disclose the apparent or actual details of the potential conflict to their supervisor/manager or to CSL Legal. In all cases, any decision taken to manage the conflict must be endorsed by CSL senior management and documented appropriately.

To avoid any potential or perceived conflict of interest, an employee must seek permission from their supervisor/manager in order to commence or continue any outside employment.

## 2 BUSINESS INTEGRITY CONTINUED

### 2.9

#### Bribery & corruption

No CSL businesses or employees will directly or indirectly offer, pay, solicit or accept bribes or give or receive personal financial rewards or inducements in exchange for making business decisions. This applies regardless of the size of the reward or inducement. Even where facilitation payments are not prohibited by law, it is CSL's policy that facilitation payments must not be made.

Our employees and directors must not give or accept gifts or entertainment where to do so might influence, or might be perceived to influence, objective business judgment.

We have a policy and compliance training programs in place to ensure that relevant employees understand their own and CSL's obligations in relation to avoiding bribery and corruption. We have created systems for identifying, communicating, reporting, investigating and resolving any non-compliance with CSL's policy and applicable laws, and regularly reinforce employee awareness of options to raise concerns.

Breach of bribery and corruption laws can result in serious consequences for CSL and employees, including substantial fines and imprisonment, and is regarded by CSL as serious misconduct, which may lead to disciplinary action up to and including termination.

## Q&A

**Q.** I am a member of a team established by CSL to assess possible alternative water filtering technologies for CSL's manufacturing facilities. As part of the assessment I am required to visit sites across Europe where one of the technologies is in operation. The supplier of one particular technology has offered to meet all first class travel expenses for the team and their respective partners. May I accept this offer?

**A.** *Accepting this offer is against CSL's policy on accepting gifts, as it could be perceived as an attempt to influence your impartial assessment of the technology and CSL's subsequent procurement decision. In offering first class travel and including partners the gift is extravagant in value and exceeds normal business practice. If you require further clarification, you should speak with your supervisor/manager, CSL Compliance or CSL Legal.*

## 2.10

### Market practices

#### 2.10.1

##### *Marketing to healthcare professionals*

The way in which pharmaceutical companies interact with healthcare professionals is an important aspect for the industry. Pharmaceutical industry organisations around the world have established various codes of conduct to regulate these interactions.

Our practices are informed by these codes and their underlying ethical principles.

We are committed to complying with all applicable local laws and regulations in each country where we operate.

Marketing in the pharmaceuticals industry takes many forms and may include:

- Sponsoring conferences and medical seminars;
- Sponsoring healthcare professionals to speak at conferences and medical seminars; and
- Sponsoring trips for healthcare professionals to attend conferences or medical meetings.

We consider each interaction carefully with an emphasis on ensuring that our products and services are represented truthfully, fairly and accurately and in full compliance with all applicable laws and codes of conduct.

We have policies and compliance training programs in place to ensure that relevant employees understand their own and CSL's obligations in relation to marketing to healthcare professionals. Failing to comply with CSL policies

in this regard is considered as serious misconduct, which may lead to disciplinary action up to and including termination.

## Q&A

**Q.** Attending medical association meetings provides a good opportunity to engage with healthcare professionals to exchange information or otherwise benefit CSL's business interests. Is it permissible to buy a meal for a healthcare professional in the course of these discussions?

**A.** *In general, it is permissible to buy a meal for a healthcare professional as part of a legitimate business relationship and provided the meal is neither extravagant considering the circumstances nor likely to be perceived as an attempt to improperly influence a business or prescribing decision. You also should confirm with the other party that by paying for a meal you are not conflicting with their organisation's policies. In addition, there are different laws and codes covering the provision of meals or gifts to healthcare professionals in different countries, and these must be observed (for example, the public disclosure of the value of the meal). Also, some healthcare professionals may also be considered government officials and additional rules may apply as a result. Please consult with CSL Compliance or CSL Legal if you require further guidance.*

## 2 BUSINESS INTEGRITY CONTINUED

### 2.10

#### Market practices continued

##### 2.10.2

###### *Labelling and product claims*

CSL's reputation and success as a trusted supplier of medicines relies on ensuring our products are accurately represented.

The labelling and advertising of pharmaceutical products are highly regulated. Advertising and promotional materials must always be true, must comply with the terms and conditions of any marketing authorisation (i.e. no "off-label" promotion), must accurately describe the risks and benefits of a product in a balanced manner and must not be misleading.

Advertising and direct-to-consumer advertising of prescription medicines are strictly regulated, and in many cases, direct-to-consumer advertising is prohibited under applicable local laws in the countries where we operate.

##### 2.10.3

###### *Product disclosure*

Product disclosure statements connected to any product manufactured or distributed by CSL are strictly controlled by applicable local laws in the countries in which we operate.

Such statements are intended to ensure healthcare professionals or patients are protected from unintended misuse of products and are fully informed as to the appropriate indications, benefits and potential risks associated with the use of our products.

We seek to ensure that all important information is included in product disclosure statements and kept up to date. The omission of important information in product disclosure statements or marketing material may be construed as misleading and deceptive.

We have strict policies and processes for the approval of product information (via our medical affairs and regulatory departments).

We have in place extensive internal training programs to ensure that all relevant employees understand and implement these policies and processes.



#### 2.10.4

##### *Trade compliance*

CSL is committed to compliance with all applicable international trade regulations, including customs controls, export and import controls and sanctions. Violations of these regulations can result in civil and criminal penalties and loss of export privileges. CSL regularly screens suppliers against government lists of sanctioned parties.

The laws regarding import, export and sanctions are complex and frequently changing, and in some regions may conflict. Employees should contact CSL's Global Trade Compliance department or CSL Legal with any questions or concerns related to trade compliance.

## Q&A

**Q.** I am undertaking a special shipment of CSL product from Europe and North America to a country we've never shipped to before. I recall hearing something about sanctions being imposed on that country. How do I know if these sanctions affect my shipment?

**A.** *Before engaging with new business partners or new locations, employees must ensure that there is no respective entry on any national or international sanctioned party lists. In the event of a positive result, employees must contact CSL Legal. Before processing an export, employees must ensure that:*

- *The item is not controlled and does not require an export/re-export license from relevant authorities; and*
- *All export and import requirements are complied with.*

*Some destinations are subject to comprehensive foreign trade regulations, embargos or sanctions and require additional considerations prior to proceeding. Employees should contact CSL's Global Trade Compliance department or CSL Legal for guidance.*

## 2 BUSINESS INTEGRITY CONTINUED

### 2.10

#### Market practices continued

##### 2.10.5

##### *Intellectual property*

The establishment and protection of intellectual property underpins our investment in research and development.

CSL will comply with all applicable laws governing intellectual property. We will establish and protect patents, trademarks, registered designs, copyright and confidential information. This includes providing the necessary information, tools and processes, to our employees to protect our assets.

CSL establishes strategic partnerships with academic and other organisations globally to complement our in-house expertise and to further the science and prospects for successful product development. These partnerships often result in shared knowledge, intellectual property or products. We will enter into collaboration agreements to address partnership aspects, including the respect and protection of intellectual property.

## Q&A

**Q.** I am looking to engage a third party to help progress the research my team has been conducting on a new therapeutic target. I need to move quickly as my contact is going overseas. Can I call them to discuss CSL's work and how they can help?

**A.** *Any information that is not already in the public domain should be treated carefully. Before discussing any confidential material with a third party, you should engage CSL Legal for advice on how best to safeguard CSL's assets and information. Generally, as a starting point, a confidentiality agreement may be required before both parties can commence discussions or collaborating.*

### 2.10.6

#### *Tax*

CSL is committed to complying with applicable tax laws and regulations in all countries in which we operate. CSL understands that tax risk arises due to the complexity of the law, its constant evolution and the inherent uncertainty of how it applies to particular facts and circumstances.

Accordingly, CSL:

- Is committed to complying with applicable taxation laws in all operating countries;
- Does not take aggressive tax positions;
- Adopts a global taxation policy; and
- Ensures tax payments, policy and tax-related risk management are reviewed and considered by the Audit and Risk Management Committee of the Board.

## 2.11

### **Entertainment and gifts**

CSL accepts that, from time to time in the course of conducting business, employees:

- May provide gifts or entertainment to customers, potential customers or others with whom CSL does business; and
- May be offered gifts or entertainment from suppliers, potential suppliers or others with whom CSL does business.

The provision or receipt of gifts or use of entertainment should be selective, appropriate and infrequent, and in line with applicable CSL policies. Gifts of cash or cash equivalent (e.g. monetary vouchers) must not be given or accepted. Entertainment of fellow employees at CSL's expense is discouraged except in specific circumstances, which must be approved by CSL senior management.

When the provision or receipt of a gift or entertainment is deemed appropriate, the type of gift or entertainment selected should reflect professional and community standards of ethics, moderation and good taste, comply with applicable laws and industry codes and be consistent with our stated values and applicable CSL policies. Gifts or entertainment must not be requested, demanded or solicited. The provision of any gift or entertainment must be transparent and properly recorded in CSL's financial records.

## 2 BUSINESS INTEGRITY CONTINUED

### 2.11

#### Entertainment and gifts continued

The giving and accepting of entertainment or gifts during purchasing and/or other contract negotiations in connection with CSL's business is not permitted (please also refer to section 2.9 Bribery and Corruption).

Some countries have regulations in place that prohibit or constrain the provision of gifts or entertainment to healthcare professionals and government officials. Entertainment (such as sports events, theatre or concerts) of healthcare professionals and government officials is prohibited under applicable CSL policies and must not be provided; and giving of gifts and providing entertainment in the form of meals (hospitality) is subject to strict requirements under these policies.

We train all relevant employees to ensure compliance with such requirements.

We have policies and compliance training programs in place to ensure that relevant employees understand their own and CSL's obligations in relation to the receipt and provision of gifts and entertainment. We have created systems for identifying, communicating, reporting, investigating and resolving any non-compliance with CSL's policies and applicable laws, and regularly reinforce employee awareness of options to raise concerns.

## Q&A

**Q.** I have recently completed a project involving employees from a partner research organisation and to celebrate I would like to take the researchers and some CSL employees involved in the project to a local finals football event. Is this allowed?

**A.** *You should refer this proposal to senior management for a decision. To gain approval you would need to demonstrate that the entertainment is appropriate and moderate considering the significance and scale of the project and the nature of the business relationship and is otherwise in compliance with CSL's policy and applicable laws.*

## 2.12

### External stakeholder relations

#### 2.12.1

##### *Political contributions*

CSL accepts that companies may need to be involved in the political environment of the country in which they operate to ensure that legitimate business and stakeholder interests are considered in the development of public policy.

We require that any contributions made to support the work of party and political candidates or representatives shall be reasonably balanced among parties and candidates or representatives and must be made in accordance with local laws and regulations and applicable authorisation levels.

We believe transparency of political contributions is important for pharmaceutical companies given the critical role governments play in the regulation, reimbursement and procurement of medicines. CSL will publicly disclose the total value of contributions annually in our Corporate Responsibility Report and on our website.

#### 2.12.2

##### *Participation in public policy*

We believe that CSL has an important role to play where public policy is being developed on issues that directly impact our businesses and where we have particular expertise.

We co-operate thoughtfully with the relevant industry associations in the development of industry and economic policy.

Where we feel CSL brings a unique and important perspective to an issue being discussed by governments, we may consider making an independent submission to provide input to and advocate for an informed debate.

## 2 BUSINESS INTEGRITY CONTINUED

## 2.12

**External stakeholder relations continued**

## 2.12.3

*Dealing with government*

CSL operates in areas that are heavily regulated. Our employees are likely to come into contact with government officials responsible for the licensure of our medical products, negotiation and management of contracts with us, and the development and enforcement of regulations that affect us.

If one of our employees has occasion to do so, they must provide information honestly and avoid falsification or omissions. We must preserve all records relevant to any government negotiation, enquiry or litigation, in accordance with the CSL Global records management policy and procedures and all our interactions with government must be compliant with section 2.9 (Bribery & Corruption) and section 2.11 (Entertainment and Gifts) of this Code.

## 2.12.4

*External communications*

CSL has authorised appropriate spokespeople to comment on our business issues to media, analysts and government. Only those authorised spokespeople should make such comment.

## Q&amp;A

**Q.** I work in a CSL Plasma collection centre and recently received a telephone enquiry from a newspaper journalist concerning the safety of one of CSL's plasma-derived therapies. Should I respond based on what I know about this topic or reply "no comment"?

**A.** *Information released publicly via the media can have important and sometimes unforeseen financial or legal impacts and affect CSL's corporate reputation. It is vital that all public comment provided by CSL, including responses to media questions is accurate, timely and consistent. Consequently, only authorised spokespersons should provide any public comment on behalf of CSL. You should politely reply to the telephone enquirer that you will arrange an appropriate spokesperson to respond as soon as possible. You should ascertain the nature of the enquiry and the caller's contact details. You must then immediately refer the inquiry to the CSL Communications representative for your region.*

## 2.13

### Privacy

#### 2.13.1

##### *Privacy of information from third parties*

CSL respects and is committed to protecting the privacy of all of the individuals we deal with, including patients, plasma donors, healthcare professionals, collaborators, and other third parties. In this regard, it is important that we comply with all applicable local laws in a timely and efficient way, both as a legal obligation and as a matter of good corporate practice.

When we collect, process, store and transfer personal data, we take appropriate precautions, in accordance with all applicable local laws, to ensure that privacy is respected and protected.

We have a policy and compliance training programs in place to ensure that relevant employees understand their own and CSL's obligations in relation to the management of personal information in accordance with applicable local laws.

#### 2.13.2

##### *Privacy of employee information*

CSL ensures that the management of employee information balances the individual's right to privacy with our legitimate business needs. We will therefore only collect employee's personal information where it is necessary for our business needs, and we will do so in a manner that is not intrusive and complies with applicable local laws.

We are committed to informing employees of their right to understand the purpose for which we collect information, their right to examine their own records and to correct any errors held on file.

## Q&A

**Q.** I am a sales representative and I would like to contact patients who use one of CSL's products to participate in a patient support program. Can I request patient details from a healthcare professional who I know has a large number of patients who use this product?

**A.** *In all countries, there are privacy laws that must be complied with in relation to the collection and use of personal information. In most cases, personal information related to a person's health is held to an even higher standard. In order to gain access to any individual's personal information, you must obtain or see evidence of their direct individual informed consent to the collection of that information and the intended use of that information. In addition, there might be other laws regulating the interactions between companies and patients that need to be strictly adhered to. Please contact CSL Compliance or CSL Legal for further information.*





# 3

## SAFETY AND QUALITY OF OUR PRODUCTS

### **CSL's Commitment:**

As a trusted and respected provider of healthcare solutions to many communities globally, CSL is committed to the development, manufacture and supply of high quality, safe products that improve the health and wellbeing of our patients.

## OUR CODE OF RESPONSIBLE BUSINESS PRACTICE

PATIENT FOCUS • INNOVATION • INTEGRITY  
COLLABORATION • SUPERIOR PERFORMANCE

### We will:

- Maintain quality systems and ensure that quality processes are understood and rigorously maintained by our employees;
- Ensure that our third parties are a part of the same process and that other pharmaceutical companies, whose products we in-source, are actively committed to these same principles;
- Notify regulatory agencies and other stakeholders promptly and as appropriate if we become aware of any safety or quality issues with any of our products;
- Work with the World Health Organization (WHO) and governments to investigate and prevent any instance of counterfeiting of our products;
- Consistently apply pharmaceutical industry best practice standards for the conduct of research and development involving animals and clinical trials with patients or individuals; and
- Implement practical business systems that protect the rights of individuals who come into contact with CSL.

## 3 SAFETY AND QUALITY OF OUR PRODUCTS CONTINUED

### 3.1 Bioethics

#### 3.1.1

##### *Research and development*

Medical research and development is vital in advancing solutions to disease and global health challenges. Healthcare professionals and the broader community rely on the safety and efficacy of pharmaceutical products, and that these products are proven through clinical trials and developed in a regulated environment.

At CSL, we are committed to carrying out such research in a transparent way, with respect for people in clinical trials, and with close and appropriate monitoring of animal welfare during animal based trials.

Our approach accords with government regulations and pharmaceutical industry good practice codes for clinical trials and animal testing.

#### 3.1.2

##### *Clinical trials*

CSL conducts clinical trials in accordance with the current guideline for Good Clinical Practice (GCP) of the International Conference on Harmonisation (ICH), the Declaration of Helsinki, and applicable local laws and regulations of the country in which the clinical trial is conducted.

These standards outline the community's expectation of pharmaceutical companies for conducting and managing clinical trials including informed consent and the protection of patient safety and privacy.

We have well developed project management procedures that ensure the implementation of and compliance with these standards.

We are committed to ensuring the transparency and public accessibility of information related to our global clinical research activities. We register our sponsored clinical trials on a public registry before trial initiation and disclose the results of these trials in a timely fashion.

We are also committed to ensuring that, where we are involved in the in-sourcing of pharmaceutical products developed by other pharmaceutical companies, those products have been approved by the relevant regulatory agencies that monitor these standards.

### 3.1.3

#### *Stem cell research*

While CSL does not undertake research involving embryonic stem cells, we have a responsibility to continue to monitor developments in all fields of research for potential application to biological medicines for the possible benefits for patients.

### 3.1.4

#### *Animal welfare*

At CSL, we are committed to maintaining the highest standards of welfare for all animals involved in our research. Any product trials conducted using animals are licensed and closely regulated under applicable local laws and international codes of practice. We apply these laws and codes of practice rigorously.

We have Animal Ethics Committees (each an AEC), which strive to ensure that scientific activities that are conducted using animals are consistent with the relevant regulations and codes, and wherever possible and permissible by law, follow the 3R principles:

- **Replacement** of animals with other methods;
- **Reduction** in the number of animals used; and
- **Refinement** of techniques used to reduce the impact on animals.

We will not start any scientific procedure or program involving the use of animals unless and until the AEC has approved the:

- Scientific procedures
- Premises; and
- Technical qualifications of persons involved in the research.

The AEC must determine that the trials are justified, after weighing the scientific value of the projects against the potential effects on the welfare of the animals, prior to consenting to the start of any projects using animals.

## 3 SAFETY AND QUALITY OF OUR PRODUCTS CONTINUED

### 3.2 Adverse events

Patient safety is of paramount importance to us.

CSL is committed to continuously evaluating the benefits and risks of our products, by collecting meaningful data on adverse events, and reporting transparently to patients, healthcare professionals and regulatory agencies.

We have an extensive pharmacovigilance program and are committed to maintaining and improving management systems and employee training that supports this program.

### 3.3 Quality

Our patients rely on the processes at CSL to ensure that our products meet their expectations for quality and safety. We are committed to developing, producing and marketing quality products that benefit all stakeholders including hospitals, healthcare professionals and patients.

We achieve this by ensuring that our products, processes and services meet all relevant specifications and are in compliance with all applicable local laws at every step in the production process. This includes comprehensive validation of the manufacturing equipment, facilities, processes and computer systems which control these processes.

## Q&A

**Q.** While attending a recent social event a guest related to me the story of their child who had experienced an unusual side effect after receiving a CSL product. What should I do?

**A.** *CSL takes product quality and safety very seriously and you have a responsibility to report all adverse reactions or product quality complaints immediately. You must report this incident as soon as possible, ensuring that in doing so appropriate steps are taken to protect the privacy of the patient. Please refer to the CSL intranet for further details on how to report adverse reactions or product quality complaints.*

Similarly, the appropriate training of all employees is critical to the consistent, effective collection of plasma and production of our medicines. CSL directs significant personnel and financial resources toward the ongoing training of staff to assure all employees are properly qualified to perform their work in accordance with all policies and procedures. The training of staff is documented in and tracked through electronic training systems.

We comply with applicable regulatory agency requirements and industry standards relevant to our operations such as Current Good Manufacturing Practices (cGMP), Good Laboratory Practices (GLP), and Good Distribution Practices (GDP) and other similar standards applicable to the pharmaceuticals industry.

Each CSL Group company has a quality system that underpins the development, manufacture and supply of our products.

We are audited by regulatory agencies to ensure that our systems and products meet the compliance requirements of all applicable regulations.

## 3.4

### Supply chain

#### 3.4.1

##### *Quality in the supply chain*

CSL's supply chain in its simplest form involves third parties, research and development, clinical trials, pilot scale production, manufacturing, logistics, marketing distribution and post-marketing surveillance.

We require and have put in place a clear set of high level policies that cover all areas of the supply chain to ensure that we comply with cGMP and GDP.

We also establish quality agreements that relate to product driven interfaces within the CSL Group or with outside contract manufacturers. These describe roles, responsibilities and systems that help ensure compliance with cGMP and GDP requirements.

## 3 SAFETY AND QUALITY OF OUR PRODUCTS CONTINUED

### 3.4

#### Supply chain continued

##### 3.4.1

##### *Quality in the supply chain continued*

To assure the highest level of quality in products received by our patients, CSL has established validated requirements for the storage and transport of products from the sites of manufacture to our patients. Each configuration for shipment of material has been tested to assure the product remains protected from contaminants and environmental conditions which may negatively impact the safety, quality, purity and potency of the products. All product shipments from the manufacturing sites to distributors are accompanied by temperature recording devices which confirm appropriate transport of product for further distribution.

Distributors are regularly audited to assure that their facilities and processes meet the standards required for appropriate handling of CSL products.

##### 3.4.2

##### *Supply chain management*

CSL selects suppliers using fair and transparent processes, making full use of competitive markets whenever possible, which ensures fair market value is paid. As part of the selection process, CSL conducts due diligence to ensure the supplier is suited to the provision of goods or services which are within the scope of CSL's normal business activities. Formal agreements with suppliers contain provisions relating to the scope of the engagement, any CSL expectations and remuneration conditions. Financial transactions are only undertaken with approved vendors established in CSL's enterprise resource planning system. We also routinely review existing supplier relationships. Any public endorsement of a supplier requires the approval of CSL Communications

We expect our third parties to comply with the applicable laws and regulations of the countries in which they operate, with the same internationally accepted best practices that we comply with, and with all the other standards set out in this Code, including:

- Avoiding conflicts of interest that may arise as a consequence of working with CSL;
- Behaving ethically and responsibly in the market place and supporting principles of fair competition;

### 3.4.3

#### *Counterfeit products*

- The appropriate use of confidential information including proprietary information and trade secrets;
- Identification and appropriate management of all risks associated with their contracts;
- Treating all employees with dignity and respect; and
- Managing their direct and indirect health, safety and environmental impacts in a responsible manner.

We expect third parties to continually improve their performance by setting performance objectives, executing implementation plans and taking appropriate corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews.

CSL has made a clear commitment to prevent the possible distribution or patient exposure to counterfeit therapies. This includes investment in serialisation technologies which allow product to be packaged with unique numerical identifiers to provide for simple and prompt verification by distributors and government agencies that a product is genuine.

In full compliance with applicable regulatory agency guidelines for the establishment of counterfeit management procedures, CSL has implemented global counterfeit procedures. These procedures provide clear responsibilities for the internal and external communication of reports of counterfeit product and details for actions required to minimise any impact on patient safety.

## Q&A

**Q.** I have been asked to secure the ongoing supply of some raw materials for a new project CSL is commencing. What principles and processes should I apply in the selection of a supplier?

**A.** *CSL has a sourcing and procurement policy that must be followed in all cases. The underlying principle is to ensure that the chosen supplier is reputable and that the selection is based on quality, product, service and price. The supplier must comply with relevant state and national legislation as well as the Code and related policies. This includes competitive sourcing principles, vendor risk assessments and supplier performance management processes. Your Site Sourcing Manager will assist you through the process.*



## 3 SAFETY AND QUALITY OF OUR PRODUCTS CONTINUED

### 3.5

#### Human rights

CSL recognises that we have a responsibility to respect the rights of our patients, clinical trial participants, plasma donors, healthcare professionals, clients and employees.

Where we are working with other third parties and manufacturers of products that form part of our total supply chain, we expect their policies and practices to similarly respect these rights.

Regardless of which country we are operating in, all of our operations are governed by the United Nations Declaration of Human Rights and the OECD Guidelines for Multinational Enterprises and the rights that they set out.

Practically, these translate into the following aspects of our business:

#### 3.5.1

##### *Child labour*

We recognise the right of every child to be protected from economic exploitation. We are therefore committed to the minimum age labour requirements in every country in which we operate.

#### 3.5.2

##### *Clinical trial participants*

Individuals should not be the subject of clinical trials without the protection of their fundamental rights as patients or without providing their fully informed consent.

We will ensure that products that are part of our research and development programs or products that we in-source from other pharmaceutical companies are not involved in any way with breaches of these rights.

#### 3.5.3

##### *Donors*

We recognise that plasma and blood donors are important stakeholders in many parts of our business. We are committed to ensuring the safety of our donors from whom we draw plasma or blood, and treating them with respect and courtesy.

### 3.5.4

#### *Employee representation*

We encourage employees to raise questions and concerns directly with their supervisor/ manager. Employees have the right to have their questions answered in a fair and timely manner.

All our employees have the right to seek representation without fear of intimidation, reprisal or harassment.

### 3.5.5

#### *Legal entitlement and minimum wage*

We will comply with workplace laws in all the environments in which we operate and our employees will receive payment which meets or exceeds the minimum wage for their work and all employment benefits that they are legally entitled to receive.

In all cases, the CSL terms and conditions of employment will meet or exceed minimum legal standards.

### 3.5.6

#### *Modern slavery*

We forbid the solicitation, facilitation, or any other use of slavery or human trafficking. Under no circumstance should any engagement with CSL deprive individuals of their freedom.

## Q&A

**Q.** A supplier who we wish to work with on the basis of the quality and price of its products is unable or unwilling to answer questions relating to its employment of child labour, acceptance of workplace representation and other workplace practices. Can we proceed to buy from them?

**A.** *No – we require our suppliers to be compliant with these workplace practices and to provide assurances that show they are committed to them. If any supplier fails to meet this standard, we must not do business with them.*



# 4

## SAFE, FAIR AND REWARDING WORKPLACE

### **CSL's Commitment:**

CSL is committed to a fair and rewarding working environment for all of our employees where there is mutual trust and respect.

We are also committed to providing a workplace that is safe and supportive of employee well-being. We recognise the value of work-life balance and consider it in development of our policies.

These commitments help ensure that we maintain a reputation as a progressive organisation that is an attractive employer and provides a stimulating and satisfying work environment that engages and retains employees in a competitive employment market.

## OUR CODE OF RESPONSIBLE BUSINESS PRACTICE

PATIENT FOCUS • INNOVATION • INTEGRITY  
COLLABORATION • SUPERIOR PERFORMANCE

### We will:

- Provide a workplace that is free of harassment and discrimination, and is a place where we treat each other with mutual respect;
- Respect and encourage diversity in the workplace;
- Ensure that remuneration always meets or exceeds legal standards and rewards employees in a way which reflects the fair market value of their services;
- Provide appropriate support and opportunity for professional development and career progression;
- Protect the health and safety of our employees and other persons present on our premises;
- Ensure that our employees are able to seek representation without fear of intimidation, reprisal and harassment; and
- Where possible, provide our employees with access to professional and independent counselling programs to support them through periods of difficulty.

## 4 SAFE, FAIR AND REWARDING WORKPLACE CONTINUED

### 4.1

#### Workplace standards

##### 4.1.1

##### Recruitment

CSL provides an objective and equitable process for the recruitment, selection, promotion and movement of potential and current employees. Global principles are in place to ensure that sourcing, assessment, recruitment and selection processes are consistently applied across the CSL Group and all applicable laws are followed.

We ensure that there is integrity in the management of the selection process and that it is free of unlawful or inappropriate bias and conflicts of interest.

We support learning and development and encourage our employees to develop their careers within the CSL Group. We strive to balance the number of employees we hire from outside the company with the number of employees we promote from within the company.

An appropriate authorisation is required to initiate any action for an open position.

In some circumstances we engage the services of independent third parties as contractors and consultants. While they are not employees of our organisation, they are important to our success and we are committed to practices which meet legal and tax obligations, maintain proper health and safety arrangements and treat individuals with respect.

## Q&A

**Q.** I am recruiting to fill a position on the production line at a manufacturing facility. The position requires frequent movement around confined spaces and I am concerned that a person with a disability would not be able to perform this job safely. Should I discourage disabled people from applying?

**A.** *No – this would be against the Code and relevant CSL policies and may also be illegal. Ensure the job specification and selection criteria accurately reflect the real and essential requirements of the job. Your concern for safety might be well based, but you cannot prejudge the ability of a disabled candidate to perform the role. You must also take into account that CSL will make reasonable adjustments to allow disabled people to participate equally in the workforce. Please contact CSL HR or CSL Legal who will be able to help you.*

#### 4.1.2

### *Equal employment opportunity (EEO) and workplace harassment*

CSL prohibits less favourable treatment of a person on the basis of attributes such as gender, age, ethnicity, religion, disability and sexual orientation. We will not tolerate harassment in any form, including bullying and occupational violence in any workplace context, including offsite conferences, training or social events. Third parties who work with CSL employees also are subject to our EEO and workplace harassment policy.

We comply with the requirements of all applicable local laws and at a minimum will:

- Inform and educate our managers and employees of the promotion of equal opportunity awareness and familiarity with local legislative requirements;
- Make employment and promotion decisions based on merit;
- Clearly communicate that we will tolerate no harassment or discrimination of any kind in the workplace, and that possible disciplinary action may be taken for breaches of the policy;
- Establish procedures that are consistent with the principles of natural justice for those wishing to make a complaint or seek advice;
- Assure our employees that we will maintain their confidentiality to the maximum extent permitted by the circumstances; and
- Ensure no retaliatory actions are taken against employees who raise concerns or escalate workplace harassment issues.

## Q&A

**Q.** One of my colleagues has told me he is homosexual and I have heard him being subject to jokes and negative comments about his lifestyle. What should I do?

**A.** *Workplace harassment is against the Code, CSL policy and may be illegal.*

*It can negatively impact the whole work group. If you have observed incidents or overheard communications that make you uncomfortable, you should report the behaviour you have observed directly to your supervisor/manager or CSL HR.*

*If the matter remains unresolved, CSL has a reporting or "whistleblower" process to report concerns. Please refer to the CSL intranet for further information.*

## SAFE, FAIR AND REWARDING WORKPLACE CONTINUED

## 4.1

**Workplace standards continued**

## 4.1.3

*Health and safety*

CSL is committed to providing safe, healthy and secure workplaces for our employees, other persons present on our premises and the communities in which we operate.

Our employees and other persons present on our premises have a responsibility to ensure that health and safety is not compromised in the workplace. To ensure this, they are expected to, as a minimum, comply with CSL's standards, policies and procedures. Employees and other persons on our premises must report all incidents and hazards, as soon as possible, so that appropriate action can be taken to prevent, correct or control these conditions.

CSL's supervisors/managers are responsible for ensuring that appropriate resources and supervision are provided so that employees and other persons on our premises can work safely. To support this, in each operation, we implement, maintain and continuously improve our health and safety management system which:

- Requires compliance with all applicable laws, licensing and other prescribed requirements;
- Requires the setting of health and safety objectives and targets aimed at the elimination of workplace injuries and illnesses, considers legislative and other operational and business requirements, and the view of interested parties;

## Q&amp;A

**Q.** My supervisor/manager demands that we meet production targets that can only be met by breaking health and safety procedures. What should I do?

**A.** *Health and safety procedures must never be compromised and putting health and safety procedures second to production targets is unacceptable. You should first discuss your concerns with your supervisor/manager. If you are uncomfortable in doing this or you are unsuccessful in getting their attention, you should speak to your health and safety manager or other senior management. If the matter remains unresolved, CSL has a reporting or "whistleblower" process to report concerns. Please refer to CSL's intranet for further details.*

- Communicates the health and safety objectives to all our employees and encourages their involvement in the improvement of health and safety performance;
- Requires continual evaluation and reports performance against targets;
- Develops, implements and reviews a health and safety management plan to reduce risk, meet objectives and to drive continuous improvement;
- Requires facilities to operate to the highest standards to protect our employees, visitors and the community in which we operate;
- Requires consultation with our employees on health and safety matters to ensure employees are considered in the decision-making processes;
- Provides appropriate training and resources so that our employees are equipped to work safely;
- Communicates the requirements of the system to all employees and is available to interested parties; and
- Is regularly reviewed for effectiveness.

#### 4.1.4

##### **Rehabilitation**

It is important that CSL employees return to work after an injury or illness as soon as appropriate. Our employee rehabilitation therefore has the dual objectives of:

- Recognising rehabilitation is a part of the compliance requirements for workers compensation; and
- Ensuring that the rehabilitation programs that we establish address the psychological and social impact of employee injuries in the workplace.

We are committed to assisting injured or ill employees return to work through early intervention and the development of injury and illness management plans.



## 4 SAFE, FAIR AND REWARDING WORKPLACE CONTINUED

### 4.1 Workplace standards continued

#### 4.1.5 *Termination and separation*

When CSL terminates an employee, we will do so in a manner that is consistent with applicable local laws and is in line with CSL's HR policies.

This may occur:

- Where there are valid reasons connected with the employee's capacity, conduct or performance;
- When there is no longer a business need for the employee's role;
- In the case of "at-will" employment, at the validly exercised discretion of the employer or employee, with or without cause; or
- As otherwise prescribed under local employment conditions or individual contracts.

### 4.2 Professional behavior

#### 4.2.1 *Mutual respect*

CSL sets high standards for professional and ethical conduct that at all times governs the way we interact with customers, suppliers, fellow employees and members of the public.

This includes:

- No tolerance for intimidation, bullying, hostility or threats;
- Extending courtesy and respect to individuals;
- Respecting the personal property of others and the property of CSL;
- Acting with integrity at all times;
- Working together to achieve better results;
- Seeking to understand and meet stakeholders' needs;
- Taking steps to understand the laws and customs of the different countries in which we operate; and
- No retaliation or reprisal of any kind as a result of an individual (or group) reporting concerns (unless the report is frivolous or vexatious) and/or participating in any investigation.

#### 4.2.2

##### *Disclosure of confidential information*

CSL expects employees to respect the confidentiality of information obtained during their employment with us and not to disclose or use such information except for a CSL approved purpose.

Information that is covered includes but is not limited to:

- CSL pricing policies;
- Strategic and product development plans;
- Financial information;
- Customer information;
- Inventions and discoveries; and
- Confidential information disclosed to CSL by third parties.

We require that our employees assign and transfer to CSL at any time without further consideration, any intellectual property developed by them in the course of their employment by CSL or developed from CSL's intellectual property. The only exception to this is where applicable local laws require that consideration is payable, in which case, the consideration payable will be the minimum payable under the applicable local laws.

## Q&A

**Q.** A healthcare professional with whom I am good friends is always anxious to provide the best available treatment and information to her patients. She has asked me for information on the results of some early stage clinical trials that CSL is conducting. As the healthcare professional is bound to respect patient confidentiality is it permissible to inform her of the outcome of the trials?

**A.** *CSL confidential information such as clinical trial results must not be disclosed or used for any purpose unless specifically approved by CSL. Consequently, you must be very careful what you discuss in conversations with this healthcare professional, restricting information that you provided to that which has already released into the public arena.*

## 4 SAFE, FAIR AND REWARDING WORKPLACE CONTINUED

## 4.2

**Professional behavior continued**

## 4.2.3

*Internal communication*

CSL is committed to ensuring that all our employees have appropriate access to relevant CSL information that will enable them to perform their jobs effectively and to better understand our business decisions.

Our internal communications process is designed to share internal information, improve decision making, and disseminate published strategic decisions that promote a shared understanding of our values and direction.

Subject to considerations of confidentiality, privacy and commercial sensitivity, we will make information about CSL available to employees in a timely manner.

We have put procedures in place to provide guidance on the development, approval and publishing of printed and electronic materials.

## 4.2.4

*Drugs & alcohol*

To maintain a safe working environment, employees must not misuse drugs or alcohol while on CSL business. Additionally, the illegal or unauthorised use, possession, sale, purchase or transfer of drugs and alcohol is prohibited at all times.

Managers responsible for CSL functions must ensure that the service of alcohol is responsible, provided that the service of alcohol is not otherwise prohibited by local laws or local CSL policies.

Any of our employees who have a dependency problem will be provided with specialised counselling support where possible.

To ensure we hire new employees who are able to contribute to a safe and productive work environment, we may require health-checks of candidates for certain roles. Such requirements are always conducted in accordance with local laws and regulations.

## Q&amp;A

**Q.** I am concerned about a work colleague whose behaviour on occasion suggests that he is under the influence of alcohol while on duty. I know he is experiencing stress in his home life and do not wish to exacerbate his personal situation but I fear that his and his colleagues' safety may be in jeopardy. What should I do?

**A.** *Although you may not be sure that alcohol is the cause of the behaviour that you have observed, if you have workplace safety concerns, you must report your concerns immediately to your supervisor/manager and your health and safety officer. The situation can then be investigated and actions taken as appropriate to protect the health and safety of your colleague and other employees.*

## 4.3

### Employee rewards

#### 4.3.1

##### *Performance management*

CSL ensures that employees in each business unit and country understand how they can contribute to the success of CSL. This includes:

- Ensuring that the performance standards and expectations for each employee are communicated and understood;
- Individual objectives, where appropriate, are achievable and are reviewed with regard to both business outcomes and CSL values;
- Encouraging communication and collaboration between the employee and their supervisor/ manager, relevant colleagues, teams and stakeholders in relation to reviewing performance; and
- Establishing a performance management framework comprising systems and procedures that support the effective management of these practices in all of our businesses.

## Q&A

**Q.** I established a workplan with my supervisor/manager and understood that this would be the basis of my annual performance assessment. It is now time to conduct my performance review, however, my supervisor/manager has not raised this with me. What should I do?

**A.** *The CSL performance management system, including the appraisal process, operates through open and constructive conversations between supervisors/managers and their direct reports. You should remind your supervisor/manager that it is time for your appraisal and schedule a time for this to occur in an uninterrupted and private environment. You and your supervisor/manager should meet prepared to discuss the extent to which you have reached your targets over the preceding year, other ways in which you added value in your role including on agreed business priorities which were not known at the time the workplan was created, any difficulties experienced, and your future workplan and development needs. Further guidance regarding annual performance assessments will be provided by CSL HR for your region.*

## 4 SAFE, FAIR AND REWARDING WORKPLACE CONTINUED

### 4.2

#### Employee rewards continued

##### 4.3.2

##### *Remuneration philosophy*

CSL directly relates the level of our employees' remuneration to their role in the business, to other personnel undertaking a similar role and to local market preferences and conditions. We use a consistent job evaluation methodology across the group, enabling direct comparison of job size and we monitor the fair market value of roles in different roles in different locations.

Our performance management system involves the establishment of performance objectives and values-based behaviours, and management of performance related remuneration.

In order to compete for and retain employees, CSL offers remuneration which is competitive in the local market for the specific role. Executive remuneration packages include fixed remuneration, and performance related rewards in the form of short term cash incentives and long term incentives aimed at aligning the interests of employees and shareholders.

In countries in which we operate, consistent with local market practice or applicable laws, CSL will make a contribution to employee retirement plans.

We will reimburse employees for legitimate work-related expenses personally incurred during the course of conducting business, such as when on business travel or when attending work-related conferences. In all cases, supervisor/manager approval is required for all reimbursement claims.

##### 4.3.3

##### *Recognition of service*

Across CSL, all businesses will recognise continued good service of employees over a series of service milestones.

##### 4.3.4

##### *Learning & development*

CSL is committed to investment in learning and development to continually improve the ability of employees to carry out their roles in a way that results in superior performance and is compliant, safe and effective. We make professional development opportunities available to employees at all levels and we build a pool of talented leaders ready to assume future leadership roles across the group.

Our learning and development system includes:

- Identification, implementation and evaluation of employee learning and development consistent with individual work plans and business requirements;
- Clearly defined links with the career development, succession and performance management processes including performance and behavioural feedback consistent with our values;

- The development of leadership capabilities which address pipeline building needs from early through to senior career levels;
- Fair access to learning and development in line with equal employment opportunity principles;
- Identification of high performing individuals by means of a common and consistent global approach;
- A global approach to succession planning to maximise career development and deployment of talent.

#### 4.3.5

##### *Disciplinary action and counselling*

CSL maintains standards of performance and conduct in the workplace through the appropriate use of informal counselling, employee training, formal counselling and disciplinary actions which result in penalties.

Misconduct of a serious nature may result in immediate termination of the employment contract. Serious misconduct can include behaviour that is:

- Illegal;
- Damaging to the business;
- A risk to the safety and integrity of CSL and its employees;
- In breach of this Code, and other internal policies and procedures; or
- Otherwise inconsistent with the continuation of the contract of employment.

The action taken in response to misconduct will depend on the severity of the situation and will be consistent within the workplace as well as meeting legal requirements of the environment. In all cases, employees will have the opportunity to explain their actions.



# 5

## COMMUNITY

### **CSL's Commitment:**

At CSL, we are committed to helping build healthier communities globally and in locations where we operate. We seek to do this in a way that aligns with our long-term business goals and uses our unique expertise and benefits.



## OUR CODE OF RESPONSIBLE BUSINESS PRACTICE

PATIENT FOCUS • INNOVATION • INTEGRITY  
COLLABORATION • SUPERIOR PERFORMANCE

### We will:

- Actively pursue community or charitable programs that will improve health and quality of life in our communities in the most effective way;
- Ensure that our employees can be involved and are committed to the delivery of those programs in their capacity as CSL representatives; and
- Respond appropriately to humanitarian crises or relief work where our products or special skills are required.



# 5

## COMMUNITY CONTINUED

### 5.1

#### Community contributions

CSL has developed an overarching community contributions framework that allows us to support our communities in a meaningful way through our core businesses and in conjunction with employees and other stakeholders.

Our investment in society is characterised by:

##### Support for Patient Communities

- Enhancing quality of life for patients in the conditions our therapies treat.
- Improving access to our biological medicines.

##### Support for Biomedical Communities

- Advancing knowledge in medical and scientific communities.
- Fostering the next generation of medical researchers.

##### Support for Local Communities

- Supporting community efforts where we live and work.
- Supporting communities in times of emergency.

We will enter into partnerships with other organisations such as non-government organisations and research institutions where this will enhance the overall effort.

We will consider contributions such as product donations for humanitarian relief where the request is made by a government or humanitarian relief organisation in accordance with applicable laws for such donations.

We will ensure that CSL-funded community investment meets all applicable local laws and codes of conduct, is respectful of local customs and is consistent with our strategic framework.

We monitor and assess our community contributions, and report publicly on our contributions.

## Q&A

**Q.** I have been approached by a representative of a not-for-profit patient group seeking a substantial donation from CSL to support tropical disease research. Should I authorise a donation from CSL to this worthy cause?

**A.** *CSL has developed a global framework to direct CSL's community investments strategically to priority areas where they will be most effective and consistent with our corporate goals and capabilities. As a matter of good governance all donations are to be made to reputable non-profit organisations that are exempt from government taxes and not to individuals. You should refer to CSL's policy on community contributions and follow the authorisation procedure established by that policy. If you require further information on CSL's community contributions program, contact the CSL Corporate Responsibility manager or your local CSL Communications representative.*



# 6

## ENVIRONMENTAL MANAGEMENT

### **CSL's Commitment:**

At CSL, we are committed to conducting all our operations in a way that minimises our impact on the environment and conserves natural resources. We view environmental stewardship as our responsibility and an opportunity to build healthier and more sustainable communities.

## OUR CODE OF RESPONSIBLE BUSINESS PRACTICE

PATIENT FOCUS • INNOVATION • INTEGRITY  
COLLABORATION • SUPERIOR PERFORMANCE

### We will:

- Operate within the environmental laws and regulations of the jurisdictions in which we work, meeting or exceeding applicable environmental standards, and taking effective action to address any instances of non-compliance should they occur;
- Establish and maintain systems of environmental management at all our manufacturing facilities;
- Engage and collaborate with our stakeholders, openly communicating accurate information about CSL's environmental performance and relevant environmental issues, including through public corporate reporting;
- Maximise the efficiency of our use of water, energy and other resources through continuous improvement of our manufacturing operations;
- Use a hierarchy of approaches for prevention of pollution including minimising the amount of wastewater, air emissions and solid waste produced, to prevent damage to human health and the environment;
- Integrate environmental stewardship into CSL's business processes, risk assessment, planning and decision making; and
- Ensure all employees and other persons on our premises are aware of their environmental responsibilities contained in this Code, and are equipped with the necessary skills and training to meet them.

## 6 ENVIRONMENTAL MANAGEMENT CONTINUED

Our policy describes our environmental commitments and provides the setting for our environmental objectives and targets.

Employees must report to their supervisor/manager any environmental incident, so appropriate action can be taken to control and prevent adverse impacts.

### Q&A

Q. We had a small spill of chemicals – just a few litres – do I need to report it?

**A. *Yes, all spills of chemicals or any other hazardous substance need to be reported to your supervisor/manager and your health and safety officer as soon as you are aware of them.***

***This will enable prompt reporting, if required, to regulatory agencies, early investigation to determine root cause and implement corrective actions, and CSL's internal reporting requirements to be met.***

## 6.1

### Climate change

CSL recognises climate change, caused by greenhouse gases produced as a result of human activity, is a pre-eminent global environmental challenge. We have a responsibility to make a contribution to addressing climate change.

#### We will:

- Measure, understand and disclose our impact on the environment;
- Minimise our climate change impact;
- Participate in relevant government climate change programs;
- Identify and manage carbon risks and opportunities; and
- Engage with employees and external stakeholders.



# 7

## COMPLIANCE WITH THIS CODE

### **CSL's Commitment:**

CSL is committed to helping our employees and third parties to understand and abide by the principles and expectations contained within this Code.

## OUR CODE OF RESPONSIBLE BUSINESS PRACTICE

PATIENT FOCUS • INNOVATION • INTEGRITY  
COLLABORATION • SUPERIOR PERFORMANCE

### **We will:**

- Ensure that all employees have access to the Code by translating it into the main local languages where we operate and distributing to every member of staff – new and existing;
- Ensure the Code is readily available to our third parties;
- Implement mandatory training programs to help our employees understand the Code, its relevance to them and their individual obligations;
- Monitor participation in mandatory training programs, take corrective action where required and review the effectiveness of Code training and education;
- Ensure that our employees, contractors and other third parties can raise concerns regarding illegal conduct, breaches of CSL policies or malpractice in good faith, anonymously (if desired and permissible) and without fear of retaliation (except where such concerns are frivolous or vexatious); and
- Seek and respond to feedback from our employees and other stakeholder groups about potential improvements to the Code.



## 7 COMPLIANCE WITH THIS CODE CONTINUED

### 7.1

#### Framework of responsibility

|   |  |
|---|--|
| CSL Board                                   | Approves the Code and sets review milestones.  |
| Global Leadership Group                     | Raises awareness, ensures accessibility, monitors compliance.  |
| Corporate Responsibility Steering Committee | Reviews and recommends improvements, facilitates stakeholder feedback.   |
| CSL Compliance/ CSL Legal/ CSL HR           | Oversee training requirements and manage breaches/ reports of noncompliance. Support supervisors/managers with enquiries and actively support reviews of the Code. |
| Supervisor/ Manager                         | Ensure employees receive the Code and comply with training programs. Monitor adherence to the Code and support employees with questions/concerns.                  |
| Employees                                   | Review the Code and participate in training programs. Seek clarification when required and raise issues of non-compliance.   |

## 7.2

### Raising concerns

CSL has prepared this Code with the intent of continuing a positive and transparent relationship with our employees, contractors and other third parties. However, we recognise that there may be times where employees, contractors and other third parties have a need to bring instances of inappropriate conduct to our attention. To enable this to happen, without reprisals, we will continue to maintain and promote the existence of procedures for our employees, contractors and other third parties to report situations where they have concerns, including the use of our “whistleblower” process and other management systems.

## Q&A

**Q.** I have been assisting my supervisor/manager to conduct a tender for CSL for a large supply contract. I am concerned that the way the tender specifications are written and the process we are following favours one supplier, who is also an old friend of my supervisor/manager, over others. How do I seek advice on whether the tendering process we are undertaking is consistent with the Code and CSL’s procurement policies, and what should I do in the case of suspect non-compliance?

**A.** *CSL encourages employees to speak up about suspected breaches of the Code and ethical issues and provides mechanisms for doing this while having regard to the privacy and reputations of all involved. You should direct your questions about whether the tender process is consistent with the Code to a senior manager or to CSL Compliance or CSL Legal in the first instance. If you are not comfortable with speaking directly to a senior manager or CSL Compliance or CSL Legal, CSL has a “whistleblower” process to report concerns. Please refer to CSL’s intranet for further details.*



## GLOSSARY

### **AT-WILL EMPLOYMENT:**

Employment that may be terminated at the will of either the employee or the employer, at any time, with or without cause.

### **BRIBERY:**

Offering something of personal value to a decision maker, in order to receive favourable treatment, typically to secure or retain business, or to obtain an improper advantage. Bribery can take the form of monetary instruments, such as cash, or can be anything of value (e.g. travel, services, discounts, gifts, etc.).

### **COLLABORATORS:**

Organisations and institutions, and their representatives, which CSL works together with in scientific and other undertakings.

### **CONFIDENTIAL INFORMATION:**

Any proprietary information (information generated by or for CSL), the unauthorised disclosure of which could cause damage to the interests of CSL.

### **CONFLICT OF INTEREST:**

The circumstance of a business executive, employee or the like, whose personal interests might benefit from his or her official actions or influence.

### **ENTERTAINMENT:**

Includes hospitality (e.g. meals), receptions, tickets to entertainment, social or sports events, participation in sporting events, lodging and travel.

**EQUAL EMPLOYMENT OPPORTUNITY (EEO):**

The right of persons to be given full and equal consideration on the basis of merit or other relevant, meaningful criteria, regardless of race, colour, gender, religion, personal association, national origin, age, disability, marital status, sexual orientation or family responsibilities.

**FREEDOM OF ASSOCIATION:**

A right identified under international labour standards as the right of workers to organise and have representation.

**FACILITATION PAYMENT:**

A small payment made to a government official to secure or expedite the performance of a routine or necessary action (e.g. the issue of a permit or license).

**GIFTS:**

Anything of value, including cash or cash equivalents, goods, or services, given to another person without (full) consideration in return.

**GOVERNMENT OFFICIAL:**

An official, representative or employee of any government department or agency, or any commercial entity in which a government body has an ownership interest or otherwise exerts control over such entity. It also includes officials of political parties and candidates for political office.

**HEALTHCARE PROFESSIONALS:**

Individuals who are authorised to prescribe, purchase, supply, administer or dispense medicines or medical devices in the course of their professional activities.

**HUMANITARIAN RELIEF:**

Material or logistical assistance provided for humanitarian purposes, typically in response to humanitarian crises. The primary objective of humanitarian aid is to save lives, alleviate suffering, and maintain human dignity.

**INFORMED CONSENT:**

A legal condition whereby a person can be said to have given consent based upon an appreciation and understanding of all the known facts and implications of an action. The individual needs to be in possession of relevant facts and also of their reasoning faculties at the time of consenting.

**INSIDER TRADING:**

When a person is in possession of price-sensitive information which is not generally available in the market place, that person cannot trade in the financial products which the information would affect (or encourage another person to do so).

**INTELLECTUAL PROPERTY:**

Any creation of the mind or intellect which has potential commercial value, and may have a right to protection under law relating to copyright, patents, trademarks, designs, etc.

**PATIENTS:**

Final recipients of the range of products produced by CSL.

**PHARMACOVIGILANCE:**

The science and activities relating to the detection, monitoring, assessment, understanding and prevention of adverse effects or any other drug-related problems.

## GLOSSARY CONTINUED

### PLASMA DONORS:

Members of the public who donate their plasma to the CSL Group, which is subsequently used to produce life-saving products. In some instances, plasma donors receive a fee in recompense for the time it takes for them to make a donation.

### PRICE SENSITIVE INFORMATION:

Information that a reasonable person would expect to have a material effect on the price or value of CSL's securities. This may include strategic information such as financial forecasts and proposed mergers and acquisitions.

### THIRD PARTIES:

Any contractor, supplier, distributor or any other companies or individuals associated contractually with CSL in the development of, supply of, manufacturing of or delivery of CSL products.

### TRADE SECRETS:

Any formula, pattern, device or compilation of information that is used in CSL's business and gives CSL the opportunity to derive an advantage over other persons who do not know or use it.

### WHISTLEBLOWER:

A whistleblower is an employee, former employee, or member of any associated organisation, who reports misconduct to people or entities that have the power and willingness to take corrective action within CSL.



CSL Limited ABN 99 051 588 348  
Our Code of Responsible  
Business Practice

Designed and produced by  
Carbon Theory, Melbourne

CRBP17 EN001

CONTENTS >

**CSL Limited**

45 Poplar Road  
Parkville, Melbourne  
Victoria 3052 Australia  
Tel: +61 3 9389 1911  
Fax: +61 3 9389 1434  
[www.csl.com.au](http://www.csl.com.au)