



**Dechra**

**CODE OF BUSINESS CONDUCT**

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**We are committed to acting responsibly and with integrity, respecting the laws, regulations, traditions and cultures of the countries within which we operate.**

**The Code is split into two, a high level summary followed by one page summaries of the main policies. It is your responsibility to read and follow the Code of Business Conduct.**

### **Our Values and Standards**

**We believe our values encapsulate our business ethics and set the standards we wish to achieve and ultimately exceed. They outline the type of people we are, the services we provide and the way we aim to do business every day.**

Our businesses deliver high quality products and services to veterinarians worldwide through our employees and the network of third parties that we work with.

We are committed to acting responsibly and with integrity, respecting the laws, regulations, traditions and cultures of the countries within which we operate. This is reflected in the “Dechra Values”, which define the core principles by which we operate.

We are also committed to working only with third parties whose standards of business conduct are consistent with our own. The expectations of our third party service providers are defined separately in our Third Party Code of Conduct.

### **Who Must Follow The Code of Business Conduct (the Code)?**

The Code sets out the standards of conduct to be adopted by all Dechra businesses worldwide. In a number of areas the standards in the Code are supported by more detailed Group or local policies and procedures. These standards apply to all employees, temporary staff, contractors and other persons acting on behalf of Dechra. In particular, line managers have a specific responsibility to lead according to these standards and to help their teams understand and apply them in practice.

Employees are required to read and sign the Code annually, via the Delta e-learning platform, to confirm their compliance Dechra’s standards of conduct. The consequences of not complying with the Code can be very serious including damage to our reputation, significant fines and penalties, and even criminal liability for individuals or the Company.

**If you have any queries in relation to the Code of Business Conduct please speak to your HR Business Partner or the Company Secretary.**



### Standards of Business Conduct

#### Our Business

We are committed to acting responsibly and with integrity. We comply with the laws and regulations and respect the traditions and cultures of the countries within which we operate.



**Competition:** We conduct our business in a manner which is consistent with fair competition and in compliance with applicable antitrust rules.

**Product Communication and Promotion:** We advertise and promote our products fairly using promotional materials which contain balanced, accurate and truthful information. We do not make false or misleading claims about our products.

**Product Quality and Security:** We are dedicated to producing high quality products. We follow the relevant local regulations and 'GXP' standards related to research, manufacture, testing and distribution, maintaining the appropriate procedures to ensure the safety, efficacy and quality of our products throughout their lifecycle.

**Anti-Bribery and Anti-Corruption:** We do not give or receive bribes or participate in corruption. Gifts and hospitality, whether given or received, should not be unreasonable nor improperly influence business decisions.

**Trade Controls and Sanctions:** We observe trade regulations, boycotts and sanctions imposed by recognised national and international authorities.

**Fraud and Tax Evasion:** We do not defraud or deceive anyone, act dishonestly or misuse company property or resources. We do not evade taxes and will not help any third parties evade their taxes.

**Conflicts of Interest:** We avoid or declare situations where our personal actions or interests could conflict with those of the business.

**Company Records and Reports:** We keep complete and accurate business and financial records and our business and financial reporting is fair, accurate and balanced

**Inside Information:** We do not misuse, or place ourselves under suspicion of misusing, information about Dechra's businesses which we have and which is not public.

**Data Protection and Confidentiality:** We keep confidential business information safe. We collect, use, retain and disclose personal data in a legal, transparent and secure manner.

**Computer Security and Usage:** We maintain secure information technology and systems and use these for business purposes. Reasonable and appropriate personal use is permitted. We are all responsible for keeping our passwords secure and not for accessing or downloading inappropriate or malicious material which could contain viruses.

### Our People

We value difference and believe diversity of people, skills and abilities is a strength that helps us to achieve our best.



**Equal Opportunities:** We recruit and promote people on the basis of their personal ability, contribution and potential. We are committed to ensuring that we promote, support and maintain a culture of fairness, respect and equal opportunity for all.

**Pay and Working Hours:** We are committed to fair employment practices and comply with national legal requirements regarding wages, including minimum wages, overtime hours and mandated benefits, and working hours.

**Health and Safety:** We provide a safe working environment for those who work for us or with us. We reinforce good safety management practices and maintain awareness of safe ways of working.

**Non-Discrimination:** We treat people fairly and do not tolerate bullying and harassment. We do not discriminate for reasons such as age, gender, sexual orientation, marital status, race, colour, ethnicity, disability, religion, political affiliation or union membership.

**Modern Slavery:** We do not use forced, bonded or indentured labour or involuntary prison labour or take part in human trafficking.

**Child Labour:** We do not use child labour. We comply with international standards on the minimum age for employment.

### Our Community and Environment

We are committed to socially responsible practices within the communities in which we operate.



**Animal Welfare and Research and Development Ethics:** We are committed to the responsible use and humane treatment of animals. We carefully consider the use of animals in research promote good practices for the care, welfare and treatment of animals used in our studies.

**Political Donations:** As a business we do not make political donations to political organisations or candidates, nor any other type of political expenditure.

**Community Support and Charitable Donations:** We encourage engagement between our employees and the community, in particular the support of local community groups and charities. We do not make donations as an incentive or reward for obtaining or retaining business. We do not make donations to organisations that we have had a commercial connection within the last two years without the prior approval of Group Legal. We do not donate to individuals or organisations that discriminate.

**Environment:** We are committed to minimising the impact of our operations on the environment by adopting responsible environmental practices and complying with applicable environmental legislation.

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### Making Decisions Using The Code

The Code cannot cover every situation or replace good judgement. It provides us with the basic ethical principles to guide our business decisions and actions when dealing with our stakeholders. If you have a question about the Code or are unsure about how to apply our standards of responsible business conduct you should:

**1. Ask Yourself:**

Why are you making this decision and is it aligned with our values and standards?

Have you read the relevant Group or local policies and procedures that apply?

Do you understand the commercial, financial, legal and reputational risks of this decision?

How would you feel if the action you take today is featured in the news tomorrow?

**2. Ask Your Manager:** Our senior managers are here to help and are responsible for helping you to understand and apply our standards of conduct in practice.

**3. Ask the Relevant Policy Owner:** Where more detailed Group or local policies and procedures are in place then the policy owners and their teams can also help with your questions.

### Raising Concerns When Something Goes Wrong

People and companies make mistakes and it is important that we correct and learn from such incidents. If you see or suspect something, even if you are not sure, which you believe to be a breach of Dechra's standards of conduct, it is important that you report your concerns so we can correct the problem and learn from it. You can make a report orally or in writing. You can report your concerns via any of the channels listed below:

**1. Your Line Manager:** You should report a concern to your line manager first. This is the preferred reporting mechanism as it supports an open culture where issues and mistakes can be raised and addressed promptly.

**2. Your Senior Management Team:** If you are uncomfortable with raising a concern with your line manager, you can report it to a more senior manager within your business function or to your Human Resources, Legal or Finance Business Partner.

**3. Group Management Team:** If you prefer to raise your concern with someone outside of your business function you can contact a member of the Senior Executive Team, the Company Secretary, or the Group Head of Internal Audit.

**4. Email Reporting:** You can report via email to [ComplianceConcerns@dechra.com](mailto:ComplianceConcerns@dechra.com). This mailbox is managed by the Company Secretary.

**5. Confidential External Hotline:** You can report an issue by telephone or via a secure web portal. A list of freephone numbers is available at: [www.safecall.co.uk/freephone](http://www.safecall.co.uk/freephone) or report on line at: [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

We will fully investigate reports of non-compliance with the Code and take appropriate actions to address these. The actions taken will depend on the circumstances and the severity of the issues identified. These actions may include process improvements, training and coaching, or formal disciplinary actions up to and including termination of employment for the most severe issues.

Every effort will be made to protect your confidentiality to encourage reporting whilst protecting our employees. Dechra will not tolerate retaliation against anyone who makes a report in good faith. Further details can be found in the Group Policy on How to Raise a Concern.

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### Our Business

#### Competition

##### **Our Principle:**

We conduct our business in a manner which is consistent with fair competition and in compliance with applicable antitrust rules.

##### **What do we mean?:**

We comply with the applicable antitrust laws in the countries where we operate. Antitrust laws differ by country but are designed to protect free and open competition in the marketplace, by preventing or correcting anti-competitive behaviour. Anti-competitive behaviour includes:

- Entering into any arrangement with competitors on sales prices;
- Agreeing the prices at which our distributors or wholesalers sell Dechra products;
- Agreeing not to compete in certain markets, territories or therapy areas;
- Discussing competitive bids with other bidding companies (bid rigging);
- Market sharing, for example agreeing not to approach a competitor's customer;
- Sharing confidential information that might reduce competition for example prices, production, our suppliers, customers or contractors, the markets we sell or plan to sell to; or
- Abusing a dominant position.

##### **What we must do:**

1. Think before you write, avoid opinions, be accurate and clear, do not over exaggerate and avoid language which could be misinterpreted to suggest a violation of antitrust laws;
2. Report any concerns to Group Legal; and
3. Notify Group Legal immediately if you receive confidential information that we should not have obtained (such as competitor information from an industry contact);

##### **What we must not do:**

1. Share confidential information with competitors;
2. Discuss setting prices with competitors;
3. Discuss or actively divide or allocate markets or customers with competitors; or
4. Discuss or take joint action against a customer, supplier or distributor.

##### **Why is it important:**

Anti-competitive behaviour can lead to criminal or civil prosecutions for both Dechra and individuals. It can also result in very large fines against Dechra. For example, breach of European competition law can result in fines of up to 10% of the Dechra Group global revenue.

##### **Procedures and Forms:**

1. Delegation of Authority Policy
2. Anti-Trust & Competition Policy

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### **Product Communication and Promotional Activities**

#### **Our Principle:**

We advertise and promote our products fairly using promotional materials which contain balanced, accurate and truthful information. We do not make false or misleading claims about our products.

#### **What do we mean?:**

To maintain the trust of veterinarians and the public, it is important that we provide accurate, fair and objective information on our products and medicines to support their safe and effective use.

#### **What we must do:**

1. Comply with local country laws and industry codes of practice on product promotion;
2. Train all customer-facing staff so that they have sufficient product and disease area knowledge to present information on our products accurately and responsibly;
3. Check that promotional activities and materials are fair, accurate and balanced and all claims are consistent with the approved product label;
4. Obtain approval for all written and electronic communications containing promotional information from an appropriately qualified regulatory, technical product manager or veterinarian; and
5. Only promote our products to veterinary professionals, using approved promotional materials.

#### **What we must not do:**

1. Promote to members of the public unless permitted by local laws;
2. Use unapproved, home-made or out-of-date promotional materials;
3. Exaggerate benefits or downplay product risks or limitations in promotional materials;
4. Promote 'off-label' use of our products;
5. Make false or unapproved statements or disparaging comments about another company's products; or
6. Send promotional communications or materials to veterinarians who have asked not to receive such information (opt-out).

#### **Why is it important:**

Appropriate disciplinary action may be taken against any employee who breaches this policy.

#### **Procedures and Forms:**

1. Local country procedures for the preparation, approval and use of promotional materials



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### **Anti-Bribery and Anti-Corruption (ABC)**

#### **Our Principle:**

We do not give or receive bribes or participate in corruption.

#### **What do we mean?:**

It is our policy to conduct all business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implement and enforce effective systems to counter bribery and corruption.

#### **What we must do:**

1. Refuse to accept any bribes, offers of bribes, or offers to engage in corrupt behaviour with any third parties, including customers, suppliers, government employees or other external parties;
2. Report all breaches, or suspected breaches of this ABC Policy or any local ABC laws, whether committed personally or by others without delay to the Group Legal Team;
3. Only engage and remunerate Third Parties for legitimate services that cannot reasonably be provided by our own people;
4. Conduct an ABC risk assessment for all new third party relationships with a value of more than £10,000 per annum including customers, suppliers and other external parties; and
5. Complete the additional ABC due diligence procedures where required by the ABC risk assessment process.

#### **We must not do:**

1. Solicit, accept, agree to receive, promise, offer or give a bribe, facilitation payment, kickback or other improper payment (including gifts and entertainment) or advantage in order to obtain or retain business, or a business advantage; or
2. Use Dechra funds to make any contributions to candidates for public office, political parties or other political organisations.

#### **Why is it important:**

Anyone who is found to be giving or receiving bribes or engaging in any other act of corruption, or otherwise breaching the ABC policy will be subject to disciplinary action which may result in dismissal.

In addition, failure to comply with the ABC policy, or any of the applicable anti-bribery laws in the jurisdictions in which we operate could result in a serious criminal offence which carries a significant fine for Dechra and/or imprisonment for any Dechra staff involved.

#### **Procedures and Forms:**

1. Anti-Bribery and Anti-Corruption Policy
2. Third Party Code of Conduct
3. ABC Risk Assessment Procedures for Third Parties

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### **Trade Controls and Sanctions**

#### **Our Principle:**

We observe trade regulations, boycotts and sanctions imposed by recognised national and international authorities.

#### **What do we mean?:**

We are required by law to comply with all United Nations (UN), United States (US), European Union (EU) and United Kingdom (UK) sanctions measures. Where stricter legal requirements apply in any country in which we operate, then those stricter requirements must be adhered to.

Where there is a conflict between different applicable sanctions laws (e.g. where an activity is permitted by the EU but not by the US) you should contact the Group Legal Team for advice and support before taking any business decision.

#### **What we must do:**

1. Conduct a sanctions risk assessment for all new third party relationships with a value of more than £10,000 per annum including customers, suppliers and other external parties; and
2. Complete a Sanctions Search Form for any third parties which are assessed as high risk and ask Group Legal for advice on what additional steps to take.

#### **What we must not do:**

1. Enter into, or maintain an ongoing trading relationship with any Third Party or related persons who are subject to sanctions measures.

#### **Why is it important:**

Failure to comply with international sanctions laws is a criminal offence which carries significant penalties for both the Company and individuals. Breaches of sanctions laws could also result in the withdrawal of our banking facilities.

#### **Procedures and Forms:**

1. Group Sanctions Policy
2. Sanctions Risk Assessment Checklist
3. Sanctions Search Form

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### **Fraud, Dishonesty and Deception**

#### **Our Principle:**

We will not defraud or deceive anyone, act dishonestly or misuse Company property or resources.

#### **What do we mean?:**

Fraud is when you try to deceive someone or act dishonestly to gain any kind of commercial, financial or personal advantage or use or involve anyone to do so. Fraud is usually related to money or property, but can also include providing false or misleading information about business activities or products. Property can include both tangible assets, for example equipment, office supplies, and intangible assets such as intellectual property. It can involve the Company or a third party.

#### **What we must do:**

1. Act honestly, fairly and openly;
2. Make sure our books and records are accurate, complete and not misleading;
3. Make sure that we provide fair, balanced and accurate information on our business activities and products to both internal and external stakeholders;
4. Base all invoices on clear and complete information and check that they comply with contractual arrangements;
5. Take great care when spending the Company's money or making financial commitments on its behalf; and
6. Report any suspicion of fraud immediately, either to a manager who is not believed to be involved or via Dechra's How to Raise a Concern procedure.

#### **What we must not do:**

1. Falsify Company expenses or claim from the Company for expenses that have not been properly incurred in carrying out Company business;
2. Use the Company's money or resources for non-work related activities or an improper purpose;
3. Ignore something that we suspect might involve fraud, theft, deception or dishonesty;
4. Make payments when we do not honestly believe we are entitled to do so; or
5. Make false claims about our business activities or products.

#### **Why is it important:**

Appropriate disciplinary action may be taken against any employee who breaches this policy.

In some countries you can be prosecuted just for being careless or reckless in letting fraud happen, even though you did not deliberately set out to commit fraud yourself.

#### **Procedures and Forms:**

1. Dechra Finance Manual and Internal Controls

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### **Conflicts of Interest**

#### **Our Principle:**

We avoid or declare situations where our personal actions or interests could conflict with those of the business

#### **What do we mean?:**

A conflict of interest is a situation where we have competing interests or loyalties which could potentially compromise our judgement or independence. Usually the conflict is about individuals benefiting at the expense of the Company or another employer. Very often, perceptions of a conflict of interest can be just as damaging as an actual conflict of interest.

We recognise that conflicts of interest are sometimes unavoidable. As soon as we realise there is a potential conflict, we must disclose it and seek approval or guidance. If you are in doubt, consult your manager, a member of the Senior Executive Team, Group Legal Director or the Company Secretary for further guidance.

#### **What we must do:**

1. Avoid direct and indirect conflicts of interest;
2. Make sure that conflicts of interest are disclosed, managed, recorded and follow any advice or recommendation provided; and
3. Discuss with your manager any personal or professional relationships that could give rise to a conflict of interest.

#### **What we must not do:**

1. Place business with a firm owned or controlled by an employee of Dechra or their family, unless authorised in advance;
2. Engage or be concerned or interested in any other business except by way of investment in shares not exceeding 3% of the equity of a company listed on a stock exchange without prior consent of the Board;
3. Hire or supervise a family member, close personal friend, or someone with whom you are having a sexual relationship;
4. Provide any services to a competitor or potential competitor; or
5. Serve as an officer or member of board of director of another business without the approval of your manager.

#### **Why is it important:**

Appropriate disciplinary action may be taken against any employee who breaches this policy. Where breaches of the law take place, it may lead to criminal proceedings against the individual or individuals concerned.

#### **Procedures and Forms:**

1. Conflicts of Interest Notification

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### **Company Records and Reports**

#### **Our Principle:**

We keep complete and accurate business and financial documents and records and ensure our business and financial reporting is fair, accurate and balanced.

#### **What do we mean?:**

All our Company documents, books, records and reports should accurately reflect the underlying business transactions or activities and present a true and fair view of the state of the business.

This includes all information that we provide to external stakeholders such as clinical trial reports, regulatory dossiers and submissions, promotional materials and communications, and financial reports and accounts.

It also includes all internal management information used for business decision making such as operational performance reports, management reports and accounts, project status reports, capital expenditure and investment proposals, and information used to make pay and bonus decisions.

#### **What we must do:**

1. Maintain and present fair and accurate business records and reports;
2. Produce all documents and reports for external stakeholders in accordance with the relevant legal, regulatory and/or financial reporting requirements;
3. Comply with internal financial controls and only process transactions in accordance with our delegated authority limits after the appropriate approvals have been received;
4. Record transactions accurately in the proper accounting period, supported by appropriately detailed evidence; and
5. Comply with all legal and regulatory document retention and disposal requirements.

#### **What we must not do:**

1. Present records and reports that are misleading because of inaccurate information or omission of pertinent information;
2. Omit to record transactions or expenditure or record these in a misleading way; or
3. Destroy or alter business information that must be kept for legal, regulatory or financial purposes.

#### **Why is it important:**

It is a legal requirement to maintain accurate company records and reports, and we also expect employees to do this in line with our Honesty value.

#### **Procedures and Forms:**

1. Group Finance Manual
2. Internal Financial Controls Standards

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### **Inside Information**

#### **Our Principle:**

We do not misuse, or place ourselves under suspicion of misusing, inside information about Dechra Pharmaceuticals PLC (the Company) and its subsidiaries (together the Group) which we have and which is not public.

#### **What do we mean?:**

Dechra Pharmaceuticals PLC is a public listed company, which is listed on the London Stock Exchange.

It is a criminal offence to buy or sell Company shares or those of any other company on the basis of inside information. Inside information means information which relates to the Company or the Company's shares, which is not publicly available, and which an investor would be likely to use as part of the basis of his or her investment decision.

The Group operates a Dealing Code which applies to the Company's Directors and to employees who are able to access restricted information about the Group (for example, employees who are involved in the preparation of the Group's financial reports and those working on other sensitive matters). Anyone who has to comply with the Dealing Code will be told.

#### **What we must do:**

1. Ask the Company Secretary if we not sure whether we can deal in securities at any particular time.

#### **We must not do:**

1. Deal in any securities of the Group if we are in possession of inside information about the Group;
2. Recommend or encourage someone else to deal in the Group's securities at that time – even if we will not profit from such dealing;
3. Disclose any confidential information about the Group (including any inside information) except where we are required to do so as part of your employment or duties. This means that we should not share the Group's confidential information with family, friends or business acquaintances
4. Behave in a way which could give, or is likely to give, a false or misleading impression as to the supply of, demand for, or the price of, any securities of the Company; or
5. Deal in the securities of any companies, if we have been given access to inside information about them (for example, one of the Group's customers or suppliers).

#### **Why is it important:**

Appropriate disciplinary action may be taken against any employee who breaches this policy. It may also mean that the individual has committed a civil and/or criminal offence.

#### **Procedures and Forms:**

1. Group Wide Dealing Policy
2. Dealing Code
3. Dealing Procedures Manual

### **Data Protection and Confidentiality**

#### **Our Principle:**

We keep confidential business information safe. We collect, use, retain and dispose of personal data in a legal, transparent and secure manner.

#### **What do we mean?:**

Data protection laws cover the collection, processing, storing and disposal of Personal Data. Personal Data is any information, such as name, address, date of birth, email address, telephone number, nationality, identification number, which can be used to identify a living person. We collect, hold and process Personal Data relating to our employees, customers, suppliers and other individuals.

There are special categories of Personal Data that are considered to be more sensitive, and these require additional measures. Sensitive Personal Data includes information about a person’s health, racial or ethnic origin, sexual life or orientation, religious or philosophical opinions, political opinions, trade union membership.

#### **What we must do:**

1. Manage Personal Data in compliance with our internal procedures, data protection principles and the regulations of the countries in which we operate and process data;
2. Only collect, hold and process Personal Data for legitimate reasons;
3. Protect the security and confidentiality of both electronic and hard copy Personal Data and promptly report the loss of any personal data to Group Legal;
4. Rectify, destroy or delete any Personal Data which is inaccurate or is no longer needed; and
5. Design our business processes and systems to support the Data Protection principles.

#### **What we must not do:**

1. Transfer Personal Data from either the UK or inside the European Economic Area (EEA) to a third party, without the prior approval of Group IT and Group Legal (especially if the third party is based or will transfer the data outside the EEA); and
2. Use Personal Data for marketing unless we have specific consent, including the use of Cookies, from the individual who the information relates to.

#### **Why is it important:**

Dechra could face fines and enforcement action taken from the data protection authorities, which will have financial and reputational impact on the business.

#### **Procedures and Forms:**

Data Protection Policy	Social Media Policy	CCTV Handbook
Document Retention Guide	Data Subject Request Handbook	Data Breach Notification Handbook
Employee Privacy Notice	IT Resources Policy & Personal Data Impact Assessment Handbook	Website Terms of Use, Privacy Notice & Cookie Policy

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### **Computer Security and Usage**

#### **Our Principle:**

We maintain secure information technology and systems and use these for business purposes. However, reasonable and appropriate personal use is permitted. We are all responsible for keeping our passwords secure, using the supplied device security measures and not accessing, downloading or sharing inappropriate or malicious material.

#### **What do we mean?:**

Our information technology and systems (IT Resources) includes:

- Desktops, laptops, surface pros and tablets;
- Servers and networks;
- Storage devices such as memory sticks;
- Telephones, mobile phones (cell phones), fax machines, printers and scanners; and
- Computer systems, for example CRM and financial systems.

The inappropriate use of IT Resources can have personal, operational and financial implications. The incorrect use of equipment and systems could lead to the transmission of viruses, the loss of personal or business data, the failure or breach of the Group's computer network and systems.

All Company information stored or communicated on IT Resources is the property of the Company. Dechra does not routinely monitor the content of email messages or other communication formats, however it may analyse communications individually or collectively for legitimate business purposes.

Occasional personal use of Dechra's communication systems and the internet is permitted, however, this is restricted to break times and out of normal working hours and can be suspended or revoked should any action impede the performance of business operations.

#### **What we must do:**

1. Follow the IT Resources Policy and Data Protection Policy;
2. Keep IT Resources and information stored on them safe and protect them against loss, damage or theft; and
3. Raise any concerns immediately with your line manager or IT representatives.

#### **What we must not do:**

1. Use IT Resources for activities that are illegal or that may harm Dechra's reputation; or
2. Use unapproved software solutions or services to capture, store or share information internally or externally.

#### **Why is it important:**

Failure to comply with this policy may result in the loss of systems, loss of business or personal data, fines by multiple external entities, and in the most severe instances criminal proceedings.

#### **Procedures and Form:**

1. IT Resources Policy
2. Data Protection Policy



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### Our People

#### Equal Opportunities

##### **Our Principle:**

We recruit and promote people on the basis of their personal ability, contribution and potential. We are committed to ensuring that we promote, support and maintain a culture of fairness, respect and equal opportunity for all.

##### **What do we mean?:**

Equal opportunity means that all people will be treated equally or similarly and not disadvantaged by prejudices or bias. This means that the best person for a job or a promotion is the person who earns that position based on qualifications, experience and knowledge.

We embrace the business and local communities in which we operate and will strive to reflect their richness and character to include such aspects as gender, race, disability and religion but also diversity of thought, background and experience.

We believe that everyone should have the right to equal access to employment and, when employed by Dechra, to equal pay and access to training and career development.

We are committed to providing a culture free from any direct or indirect discrimination, harassment or bullying. We will not tolerate any behaviour that detracts from this.

We acknowledge that we must continue to promote diversity, equity and inclusion in order to maintain an organisation that attracts, supports and promotes the broadest range of talent.

##### **What we must do:**

1. Recruit and promote on the basis of personal ability, contribution and potential;
2. Make opportunities for training, development and progress available to all;
3. Promote, support and maintain a culture of fairness, respect and equal opportunity for all;
4. Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others; and
5. Comply with all employment laws.

##### **What we must not do:**

1. Treat anyone unfairly or accept any form of discrimination.

##### **Why is it important**

Appropriate disciplinary action may be taken against any employee who breaches this policy. Where breaches of the law take place this may lead to criminal proceedings against the individual or individuals concerned.

##### **Procedures and Forms:**

1. Diversity Policy
2. Dignity at Work Policy

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### **Health and Safety**

#### **Our Principle:**

We provide a safe working environment for those who work for us or with us. We reinforce good safety management practices and maintain awareness of safe ways of working.

#### **What do we mean?:**

Dechra commits to providing a safe place of work and communicating any procedures or resources which are needed to work safely. We all have an obligation to follow any requirements that are put in place to keep us safe and healthy.

#### **What we must do:**

1. Understand and follow all Health and Safety rules, standards or procedures for the location or type of work, whether at a Dechra location or when working with customers or suppliers;
2. Take responsibility for our own safety and that of others. Stepping in when we see something unsafe, whether actual or potential, and accept challenge from others in a positive way;
3. Report all health and safety incidents, including accidents, near misses, non-compliance with regulations or anything else posing a risk to Health and Safety;
4. Understand the hazards associated with our own jobs and our colleagues' jobs;
5. Always complete any Health and Safety training required for our role and never attempting tasks for which we are not trained or competent;
6. Be aware of emergency procedures that apply to our place of work whether on Dechra premises or when out and about, and always follow these when required;
7. Wear appropriate protective equipment correctly whenever required, to protect our immediate safety and long term health; and
8. Make all contractors or visitors aware they must follow all Health and Safety requirements applicable to the location.

#### **What we must not do:**

1. Never turn away if we see an unsafe condition or someone in danger;
2. Breach any safety procedure or tamper with any safety devices provided to keep us safe;
3. Use any defective equipment or do any job for which we are not trained; or
4. Conceal accidents, incidents or work related ill health.

#### **Why is it important:**

Failure to comply with this policy may result in injury or harm to you or your colleagues, ill health or damage to property. Disciplinary action may be taken where breaches of Health and Safety requirements put people and property at risk.

#### **Procedures and Forms:**

1. Group Health and Safety Policy

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### **Dignity at Work (bullying, harassment and discrimination)**

#### **Our Principle:**

We treat people fairly and do not tolerate bullying and harassment. We do not discriminate for reasons such as age, gender, sexual orientation, marital status, race, colour, ethnicity, disability, religion, political affiliation or union membership.

#### **What do we mean?:**

Discrimination is being treated unfairly because of your age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, marriage or a civil partnership. These are referred to as 'protected characteristics'.

Harassment occurs when a person engages in unwanted conduct which violates your dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for that person. The harassment must relate to the protected characteristics.

Bullying is unreasonable behaviour from a person or group which could reasonably be regarded as undermining the individual's right to dignity at work and / or conduct which undermines, ridicules, threatens, intimidates or is physically abusive to an individual or group.

#### **What we must do:**

1. Treat everyone fairly and with courtesy;
2. If you feel that you have been harassed, sexually harassed, bullied, victimised or treated in a way that breaches our Company policy, if you are able to do so, immediately tell the individual(s) responsible. If you feel uncomfortable in doing so, you should speak to line manager or local HR representative; and
3. Encourage and support colleagues if they challenge inappropriate behaviour.

#### **What we must not do:**

1. Raise malicious complaints;
2. Spread a false rumour about a colleague;
3. Humiliate, make inappropriate jokes or exclude a colleague;
4. Tolerate any action or behaviour that could be viewed as bullying or harassment;
5. Treat anyone unfairly or accept any form of discrimination; and
6. Be violent or threaten to be violent (physical or verbal).

#### **Why is it important**

Appropriate disciplinary action may be taken against any employee who breaches this policy. Where breaches of the law take place this may lead to criminal proceedings against the individual or individuals concerned.

#### **Procedures and Forms:**

1. Dignity at Work Policy (to be extended to rest of Group)

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### Our Community and Environment

#### Animal Welfare

##### **Our Principle:**

We are committed to the responsible use and humane treatment of animals. We carefully consider the use of animals in research promote good practices for the care, welfare and treatment of animals used in our studies.

##### **What do we mean?:**

The scientific purpose of involving any animals in the development of our products is reviewed and approved by Regulatory Agencies. For each individual study, an Animal Care And Use Committee approves the protocol.

Dechra believes that scientists, and all participants in animal research, are responsible for respecting each animal and providing an environment that meets the core concepts of animal welfare:

- Appropriate housing for each species;
- Provision of quality food, water, and shelter;
- Careful attention to the health and well-being of each animal;
- Access to environments that stimulate and allow the animals to express natural behaviours; and
- Checking each animal has the right to a safe and distress free environment.

##### **What we must do:**

1. Consider whether the number of animals can be reduced, replaced or the procedure refined to minimise distress before undertaking animal studies;
2. Maintain high standards of animal care and welfare in our scientific research; and
3. Hold third party research organisations to the same high standard to enable all animals to be treated in a humane and ethical manner.

##### **What we must not do:**

1. Engage with third party Contract Research Organisation who do not meet the core concepts of animal welfare.

##### **Why is it important:**

It is our mission to develop products to improve animal welfare in an ethical way

##### **Procedures and Forms:**

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### **Charitable Donations (and Political Donations)**

#### **Our Principle:**

The Group encourages the promotion of engagement between our employees and the community and in particular the support of local community groups and charities. As a business we do not make political donations to political organisations or candidates, nor any other type of political expenditure.

#### **What do we mean?:**

Charitable donations can be monetary or in-kind, and can be made either to local community groups, an employee nominated charity, or an animal welfare charity. A donation-in-kind can be in the form of obsolete and/or short dated products, damaged products and consumables.

Senior Managers (that is Senior Executive Team (SET) minus one) have the discretion to allocate funds each year up to £5,000 from their own budget to charitable donations with the approval of their respective SET member. This allocation can be used to fund charitable donations throughout the year whether this be to one charity or a number.

#### **What we must do:**

1. Check that the donation is appropriate and properly approved in accordance with the Delegation of Authority Limits;
2. Keep records about information relating to donations, such as the monetary value of the donation, type of donation and beneficiary;
3. Check that product donations are only provided to charities for their own use;
4. Check for potential conflicts of interest; and
5. Check that the charity is a bona fide charity with the appropriate registrations.

#### **What we must not do:**

1. Give charitable donations to:
  - Individuals;
  - Political organisations or candidates for public office;
  - Organisations that discriminate on the basis of race, religion, age, colour, sex, disability, national origin, ancestry, marital status, sexual orientation, or veteran status;
  - Organisations with the primary focus of providing religious instruction;
2. Make political contributions or be involved in any political activity in the name of the Company; or
3. Offer or make a charitable donation as an incentive or reward for obtaining or retaining business or for any other improper purpose, or to organisations we have had a commercial connection within the last two years without the prior approval of Group Legal.

#### **Why is it important:**

Appropriate disciplinary action may be taken against any employee who breaches this policy.

#### **Procedures and Forms:**

1. ABC Policy

2. Donations Form