



Driven by Our Promise™

Contents

1	Our Purpose and Values	3	3	Safety and Quality of Our Products	24	4	Safe, Fair and Rewarding Workplace	34
1.1	CSL's Purpose and Values	4	3.1	Research and Development	26	4.1	Workplace Standards	36
1.2	Scope	7	3.1.1	Patient Focus and Public Health	26	4.1.1	Talent Management	36
1.3	Making Good Decisions	7	3.2	Bioethics	27	4.1.2	Equal Employment Opportunity (EEO) and Workplace Harassment	37
			3.2.1	Advances in Science and Technology	27	4.1.3	Health and Safety	38
2	Business Integrity	10	3.2.2	Clinical Trials	27	4.1.4	Rehabilitation	38
2.1	Risk Management	12	3.2.3	Animal Welfare	30	4.1.5	Termination and Separation	38
2.2	Compliance with Laws and Regulations	12	3.3	Pharmacovigilance	31	4.2	Professional Behaviour	39
2.3	Internal Controls and Reporting	13	3.4	Quality	31	4.2.1	Mutual Respect	39
2.4	Protection of Assets and Information	13	3.5	Supply Chain	32	4.2.2	Disclosure of Confidential Information	39
2.5	Continuous Disclosure	15	3.5.1	Quality in the Supply Chain	32	4.2.3	Employee Communication	40
2.6	Trading in Securities	15	3.5.2	Supply Chain Management	32	4.2.4	Drugs and Alcohol	40
2.7	Competition	16	3.5.3	Counterfeit Products	32	4.3	Employee Rewards	41
2.8	Conflicts of Interest	17	3.6	Human Rights	33	4.3.1	Performance Management	41
2.9	Bribery and Corruption	18	3.6.1	Child Labour	33	4.3.2	Remuneration Philosophy	41
2.10	Market Practices	19	3.6.2	Clinical Trial Participants	33	4.3.3	Recognition of Service	42
2.10.1	Marketing to Healthcare Professionals	19	3.6.3	Donors	33	4.3.4	Learning and Development	42
2.10.2	Labelling and Product Claims	19	3.6.4	Employee Representation	33	4.3.5	Disciplinary Action and Counselling	42
2.10.3	Product Disclosure	19	3.6.5	Legal Entitlement and Minimum Wage	33			
2.10.4	Trade Compliance	19	3.6.6	Modern Slavery	33	5	Community	43
2.10.5	Intellectual Property	20				5.1	Community Contributions	45
2.10.6	Tax	20						
2.10.7	Market Expansion	20				6	Environmental Management	46
2.11	Entertainment and Gifts	21				6.1	Climate Change	48
2.12	External Stakeholder Relations	22						
2.12.1	Engaging with Government Officials	22				7	Compliance with this Code	49
2.12.2	Participation in Public Policy	22				7.1	Framework of Responsibility	51
2.12.3	External Communications	22				7.2	Raising Concerns	52
2.13	Privacy	23						
2.13.1	Privacy of Information from Third Parties	23				8	Glossary	53
2.13.2	Privacy of Sensitive Information of Others	23						
2.13.3	Privacy of Employee Information	23						



I am pleased to introduce our fourth edition of CSL's Code of Responsible Business Practice (the Code). Like our first three editions, this important publication has been approved by the Board and carries our full support and commitment.



Dear CSL Colleagues

If you've seen previous editions of CSL's Code of Responsible Business Practice (the Code), you know I am extremely proud of the Values-based culture that differentiates our workplace from other companies. I continue to be deeply inspired and moved by seeing all of our colleagues bring our Values to life every day to ensure we stay committed to helping patients and protecting public health.

At CSL, we know it's not only about what we do to drive scientific innovation and improve health outcomes around the globe, it's also about *how* we do it. As a global biotechnology leader with business in more than 70 countries today, CSL is deeply committed to conducting our work in a responsible way and ensuring our people do the same.

While our Values – patient focus, innovation, collaboration, integrity and superior performance – serve as the directional compass of our work, our Code provides a more detailed map to enable values-based, unbiased and intelligent decisions and deliver on our promise in ways that exemplify the highest standards of conduct throughout the organisation.

Our practice of periodically updating our Code is intentional to ensure we stay the course and remain focused on our purpose and our promise. I encourage you to review our Code to understand how it impacts your role and the way in which you represent CSL in business and the broader community. Our patients, our people and all of our stakeholders deserve nothing less.

Paul Perreault
CEO and Managing Director
CSL Group



1

Our Purpose and Values

In this section

1.1	CSL's Purpose and Values	4
1.2	Scope	7
1.3	Making Good Decisions	7





1.1 CSL's Purpose and Values

At CSL, we care deeply about the work we do, the patients and communities we serve, the partners with whom we collaborate and the shareholders we reward. Our purpose underpins this culture.

Our Purpose

The people and science of CSL save lives. We develop and deliver innovative medicines that help people with serious and life-threatening conditions live full lives and protect the health of communities around the world. Our Values guide us in creating sustainable value for our stakeholders.





Our strong commitment to living our Values has guided us for many years. Our Values have been fundamental to our success, helping us to save lives, protect the health of people, and earn our reputation as a trusted and reliable global leader. They're at the core of how our employees interact with each other, make decisions and solve problems.

Patient Focus

We deliver on our
promise to patients

As a global biotechnology company focused on life-threatening conditions, our patients are our passion. We listen closely to understand their challenges and develop therapies that provide meaningful benefits. Our commitment to save lives and protect the health of people around the world is strong. We pursue newer and better therapies, ensuring greater access to our medicines, and ultimately, improving the quality of life for those in need.

Innovation

We turn innovative
thinking into
solutions

At CSL, science and innovation is in our DNA. We invest in powerful technologies to develop new products and improve existing ones. Our dedication to research and development of novel therapeutics ensures that we continually build a robust pipeline of safe and effective life-saving medicines. CSL's innovation is enterprise-wide. Our people think and act progressively. They apply innovative ideas to continuously improve our decision-making, processes and systems.

Integrity

We walk the talk

We always strive to do the right thing for our patients, communities, shareholders and employees. We have high standards for our leaders and employees to both communicate and act honestly, ethically and transparently. We build trust by holding ourselves and one another accountable for consistently demonstrating these behaviours. Always mindful of our responsibility to, and respect for, the planet, we follow sustainable and responsible practices around the world.

Collaboration

We are stronger
together

We respect the unique perspectives, contributions, backgrounds and lifestyles of our colleagues and work in a manner that is inclusive. Our collective strength is optimised when we openly challenge assumptions, make space for debate and unite as a team when decisions are made. We remove obstacles and ensure collaboration doesn't hinder our agility. We partner with the broader medical community by investing in education, clinical research and scientific exchange to improve lives in the communities we serve.

Superior Performance

We take pride
in our results

Our goal is to achieve superior results both as a team and as individuals. The pursuit of excellence in product, financial, operational and workplace outcomes is central to CSL's success. Our people develop and grow in this environment of continuous improvement. We recognise and reward those who go 'above and beyond' in their job duties and encourage our employees to invest in their wellbeing so they can realise their full potential.



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

- conducting CSL's business with the utmost integrity through a shared commitment to understand and comply with all applicable local laws and regulations in all countries in which we operate;
- maintaining and communicating standards that guide our people and third parties toward appropriate decisions, even in situations that present challenging ethical dilemmas;
- having accepted workplace relations principles, including mutual respect, non-discrimination and freedom of association;
- ensuring 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;
- executing responsible environmental practices that minimise our environmental impacts; and
- implementing 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.





1.2 Scope

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.

1.3 Making Good Decisions

An integral part of responsible business practice is making good decisions.

CSL has an ethics-based decision-making tool that weaves together CSL's purpose, Values and principles to establish a clear point of reference when making decisions across the organisation, whether big or small. This tool should be used when CSL employees are faced with a difficult situation or decision, or instances in which an ethical answer is not obvious, or puts our corporate values in conflict with each other. You should always refer back to CSL's purpose, Values and principles.

Our Principles

CSL adheres to the following decision-making principles:

- We are guided by the interests of our patients, donors and public health.
- We tell the truth.
- We do what we say we will do and take responsibility for our actions.
- We respect and consider the rights of all people, including those different from us.
- We would be happy and willing to stand by our decision if all the details were made public.

CSL's Good Decision-Making Tool (the Tool) brings together all of the components required for making responsible decisions. The Tool and supporting materials is available to employees on CSL's intranet.

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.



1
Our Purpose
and Values

2
Business
Integrity

3
Safety and Quality
of Our Products

4
Safe, Fair and
Rewarding Workplace

5
Community

6
Environmental
Management

7
Compliance
with this Code

Glossary





Q

I would like further information on other aspects of the Code and Decision-Making Tool. How do I get further information?

A

Further guidance and support tools are available on CSL's intranet.

Q

As a supervisor/manager, what are my responsibilities to my team?

A

Supervisors/managers must ensure employees receive the Code and comply with training programs. They should monitor adherence to the Code and support employees with questions/concerns. Most importantly, they should model and demonstrate the behaviours expected of employees as detailed in the Code and CSL policies.



2

Business Integrity

In this section

2.1	Risk Management	12
2.2	Compliance with Laws and Regulations	12
2.3	Internal Controls and Reporting	13
2.4	Protection of Assets and Information	13
2.5	Continuous Disclosure	15
2.6	Trading in Securities	15
2.7	Competition	16
2.8	Conflicts of Interest	17
2.9	Bribery and Corruption	18
2.10	Market Practices	19
2.11	Entertainment and Gifts	21
2.12	External Stakeholder Relations	22
2.13	Privacy	23





CSL's Commitment:

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

We:

- expect that all our employees understand and comply with all applicable laws, regulations, guidelines, standards and codes wherever we operate;
- enable management systems to support awareness of and compliance with laws, regulations, guidelines, standards and codes as they apply to our global business; and
- measure and manage business outcomes and seek to apply the principles of continuous improvement to enhance our responsible business practices on an ongoing basis.





2.1 Risk Management

Risk management is an integral element of CSL's 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 all our processes at every level, supporting our workforce in increasing risk awareness.

CSL has adopted the AS ISO31000: 2018 Risk Management (Guidelines) as the basis of our coordinated global risk management process. CSL's implementation of risk management is detailed in CSL's Enterprise Risk Management Framework. A key component of our Framework, our risk appetite statements set out the types and extent of risk CSL is willing to accept in pursuit of global strategic objectives, while adhering to our core Values and reinforcing our commitment to responsible conduct.

This Framework plays an important role in ensuring 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 and Regulations

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

In certain aspects of our business, we have made further commitments to comply with both local and international pharmaceutical industry codes of conduct. This includes in the marketing of our products; our relationships with healthcare professionals, healthcare organisations and other healthcare stakeholders, such as patient organisations; and our research and development. For product safety and quality, employees are required to comply with global policies and procedures within CSL's Quality Management System.

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

Q

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

A

Compliance is best assured through understanding applicable laws and standards, completing all assigned CSL training on time, and proactively raising questions with the Ethics & Compliance or legal teams when you are uncertain as to your obligations or the permissibility of certain conduct.

Wherever we operate, CSL must comply with applicable 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 patient, customer, donor, regulator and 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.

Every employee is responsible for the effective management of business records in accordance with both the CSL Global Records Management Policy and Records Retention Schedule. These documents govern the creation, storage and eventual disposal of business records in all formats, whether electronic or paper-based.

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.

In cases where CSL anticipates or has knowledge of an investigation, litigation, audit or other legal or regulatory inquiry, we may as required issue a legal hold order to temporarily suspend the Records Retention Schedule in order to preserve certain relevant records.

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, unless there is a legal hold order in place, you should dispose of records meeting or exceeding their retention periods. Remember to consider email and other electronic records as well as any paper 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.

2.4 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.

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. 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. Sharing or disseminating CSL proprietary information must conform to CSL security policies, available on CSL's intranet.

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.

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 which is in violation of any applicable law, damaging to a person's or CSL's reputation, or may be considered offensive or inappropriate by normal community standards.



2.4 Protection of Assets and Information continued

We apply filters to CSL electronic equipment to prevent access to websites 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.

CSL can monitor internet, applications and internal network use if there is a risk CSL information assets are being misused, always subject to applicable laws. 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 full compliance with applicable data privacy 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.

Q

What information can I share or not share outside CSL?

A

CSL classifies information into three categories.

1. Public – information is publicly shareable.
2. Confidential – information is shareable with all employees and contingent workers under an approved non-disclosure agreement.
3. Restricted confidential – information is shareable with some employees and contingent workers managed by an access control list.

Q

I want to download the contents of my CSL laptop so I can use my home computer to perform data analysis on CSL production data. I realise this information is considered confidential and, in some cases, restricted confidential. However, my computer equipment at home is more powerful than my CSL-issued laptop. Is this acceptable use?

A

Downloading confidential or restricted confidential CSL information to a personally owned computer is prohibited. If you believe your CSL-issued equipment is not powerful enough or missing features that are necessary for you to perform your job, discuss this with your manager.

Q

I am involved in the election for our local city council and serve on the re-election committee of several candidates. May I use CSL equipment in support of these efforts?

A

No. CSL prohibits the use of CSL assets for political purposes. This includes the use of company email and network services.

Q

I want to email some CSL documents to my partner to proofread my writing. My partner is not a CSL employee. Is this OK?

A

No. Using email to share CSL information and data is not permitted with non-CSL employees or contingent workers not covered under an approved CSL non-disclosure agreement.



2.5 Continuous Disclosure

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 continuous disclosure 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.

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 trading any such shares.

Insider trading laws prohibit directors or employees from trading CSL shares when 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 securities dealing 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 number of my shares of restricted stock have just vested, and I would like to sell them as I've done every year in the past. CSL is not in a blackout period but I'm currently working on a confidential acquisition. Can I sell my shares?

A

If you are working on a confidential transaction, such as an acquisition, you should contact the Company Secretary before selling your shares to discuss whether you are in possession of material that is non-public information.



2.7 Competition

Compliance with competition law is fundamental to our organisational 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 competition laws;
- result in a coordination of market behaviour with competitors;
- gather competitive intelligence other than in a manner that is ethical, transparent, and in compliance with all laws and regulations; or
- constitute other unfair practices.

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

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

Q

A project manager is preparing for a presentation on marketing plans for next year. While the presentation itself focuses mainly on promotional concepts and business plans, the manager wants the presentation to show how 'aggressive' the team has been in developing ideas, and how confident they are about success. Can the manager state that their strategy will 'prevent competitors from entering this space' and that the CSL Group will 'dominate the market'?

A

No. These words have developed a particular legal meaning indicating potentially anti-competitive conduct. Using such words (even if not intended to be anti-competitive) could trigger investigations, litigation and serious damage to CSL's reputation. Please consult CSL Legal and/or CSL Ethics & Compliance on any presentations that relate to competition issues.



2.8 Conflicts of Interest

In carrying out their 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 an actual or potential 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 family, friends, neighbours, or any third-party group or organisation is reasonably 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;
- 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.

Q

My uncle works for one of CSL's preferred vendors. Could there be a conflict of interest?

A

Yes. Our family and household members who work for a customer, distributor, competitor or supplier of CSL pose special potential for conflicts. In this case, there may be a conflict of interest depending on your position at CSL and your influence on purchasing decisions. You should disclose the information to your supervisor/manager and/or CSL Ethics & Compliance and seek further assessment. CSL can then take appropriate steps to address the situation.



2.9 Bribery and Corruption

CSL businesses and employees are prohibited from directly or indirectly offering, paying, soliciting or accepting bribes or giving or receiving personal favours, financial or other rewards or inducements in exchange for making business decisions. This prohibition applies regardless of the value of the reward or inducement. CSL policy also prohibits facilitation payments.

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

We have policies and compliance training programs in place to assure that relevant employees understand their own and CSL's obligations in relation to the avoidance of engagements that may constitute bribery and/or 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

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 our CSL team. May I accept this offer?

A

No. Accepting this offer would violate CSL's policy as the provision of such value could be perceived as influencing your impartial assessment of the technology and CSL's subsequent procurement decision. In offering first-class travel, the gift is improper, arguably extravagant, in value, and exceeds normal business practice. If you require further clarification, you should speak with your supervisor/manager or CSL Ethics & Compliance.

Q

I think our distributor may be providing inappropriate entertainment to some government officials to secure tender awards. Do I need to worry about this or discuss it with the Ethics & Compliance team given that it is the distributor who is doing this and not CSL?

A

Yes. You do need to discuss this matter immediately with Ethics & Compliance. If the distributor is acting on behalf of CSL and we know or think that the distributor is engaging in this type of activity, we can be implicated. It is, therefore, critically important to discuss this.



2.10 Market Practices

2.10.1 Marketing to Healthcare Professionals

The way in which pharmaceutical companies interact with healthcare professionals is an important issue for the industry. In addition to laws and regulations governing marketing practices, pharmaceutical industry organisations around the world have established various codes of conduct to govern 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 we operate in.

Marketing in the pharmaceutical 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 to be serious misconduct, which may lead to disciplinary action up to and including termination.

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

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

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 extensive internal training programs in place 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, import and export controls, and sanctions. Violations of these regulations can result in civil and criminal penalties and loss of export privileges. CSL regularly screens third parties, customers, and employees 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 healthcare professional wants to tell their colleagues about CSL products and asks if we could pay them a consulting fee to do so. What should I say?

A

You should tell them that we pay healthcare professionals only through CSL programs designed to meet specific business or scientific needs and only if those programs are approved as required by applicable procedural documents. As part of such programs, CSL may compensate a healthcare professional for needed consulting services under a written contract approved according to applicable procedural documents.



2.10 Market Practices continued

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 Global Trade Compliance for further investigation. Before processing an export, employees must ensure that:

- the item is not controlled and does not require an export/re-export licence 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 Global Trade Compliance or CSL Legal for guidance.

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, trade secrets 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 and confidential information.

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 consider intellectual property protection and the nature of the engagement we envisage, and engage CSL Legal for advice on how best to safeguard CSL's assets and information. Generally, as a minimum starting point, a confidentiality agreement will be required before both parties can commence discussions and 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 and will apply the principles in the Organisation for Economic Co-operation and Development (OECD) Transfer Pricing Guidelines when determining the appropriate transfer prices for international transactions between related parties;
- does not take aggressive tax positions and will only implement transactions that are aligned with our business activity, have clear commercial objectives, and do not rely on tax for their commercial viability;
- adopts a Board-approved 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.

2.10.7 Market Expansion

Expansion into new markets or geographies is critical to our ability to sustain growth and continue to deliver on our promise to patients and public health. CSL is committed to undertaking sufficient due diligence when evaluating the countries with which we do business, and on what basis this business is conducted.



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 equivalents (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.

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. Providing entertainment in the form of meals (hospitality) is subject to strict requirements under these policies.

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.

For further guidance, please contact CSL Ethics & Compliance or CSL Legal.

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 must consider whether the research organisation accepting this entertainment might be perceived as an improper recognition for the work done. You must also consider if you could potentially involve this organisation in future projects and whether socialising with employees from the organisation might jeopardise this.

In any case, if you have offered tickets that are expensive or difficult to obtain (e.g. tickets to a premier event), the value of the entertainment would be considered excessive. In this case, you should not offer it. Likewise, if you are invited by a third party (e.g. distributor, agent) to attend an entertainment event (e.g. sporting event, concert) you must assess the appropriateness of the invitation with your supervisor/manager or Ethics & Compliance team.



2.12 External Stakeholder Relations

2.12.1 Engaging with Government Officials

CSL engages with government officials and other stakeholders to contribute to the formulation of public policy in the countries in which we operate. We do this to ensure that public policy reflects the legitimate interests of the many stakeholders we serve and are responsible for, including patients, plasma donors, employees, investors, and the local communities in which we have a presence.

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, the terms of access, funding and recommendations of our products, the negotiation and management of contracts with us, and the development and enforcement of regulations that affect us.

We require that any interactions with government officials be conducted ethically and in accordance with applicable laws and regulations. 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 and Corruption' and section 2.11 'Entertainment and Gifts' of this Code.

Where contributions are permitted to political candidates or other political stakeholders by CSL or by the CSL Employees Political Action Committee, to which US employees may voluntarily contribute, they must be reasonably balanced among parties and candidates or representatives. Such contributions must be made in accordance with local laws and regulations and applicable authorisation levels.

We make decisions regarding how to undertake political contributions based on an understanding of the business relevance of the individual or political parties' involvement in public policy issues that are important to CSL, taking into account stakeholder expectations and the ability to create shared value for patients and public health.

We believe transparency of political contributions is important for pharmaceutical companies given the critical role governments play in the regulation, recommendations, reimbursement and procurement of medicines and biopharmaceuticals. CSL will publicly disclose the total value of contributions annually in our annual report available on CSL.com.

Contact your local public affairs representative if you are in any doubt as to whether you should be directly engaging with government officials.

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 work directly with government and other stakeholders to provide our perspectives on issues where we can offer particular expertise or insights to inform the formulation of policy.

We also cooperate thoughtfully with relevant industry associations in the development of industry positions that align with our Values and interests.

2.12.3 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.



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."?



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.



I am attending a scientific conference and am really excited about the recent results my team has obtained for a novel therapy. I've prepared some detailed slides I will share with the conference attendees. Do I need to obtain approval before I do?



Information acquired during research and development activities is a key asset which is extremely valuable and must be managed to yield the maximum value for CSL and our stakeholders. It is essential that no disclosure of information occurs without a proper assessment as to the effect of the disclosure. Employees must follow CSL's Disclosure of Research & Development Information Policy before publicly sharing any information.



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 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 protected and the rights of individuals are respected.

We have 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 Sensitive Information of Others

CSL may collect sensitive information from our patients, plasma donors, healthcare professionals, collaborators and other third parties. This sensitive information may include physical identifiers (such as fingerprint scans), healthcare information and financial information. These types of data require a higher level of privacy protection. Therefore, CSL is committed to limiting the collection of this information to what is necessary to carry out the business purpose, and processing it in a manner that is compatible with applicable local laws.

Q

While waiting to speak to a physician in their office, may I review patient registration lists or medical charts?

A

No. The viewing of a patient registration list or medical data under these circumstances is contrary to a patient's expectation of confidentiality and privacy.

2.13.3 Privacy of Employee Information

CSL ensures that the management of employee information is undertaken in accordance with applicable local laws. In some cases, the collection of employee information may be required by law. In other instances, CSL ensures that how the data is collected and used balances the individual's right to privacy with our legitimate business needs. We will therefore only collect employees' 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, to examine their own records and to correct any errors held on file.

Q

I am an employee of CSL. What kind of data about me does CSL collect and use?

A

As with all employers, CSL collects and uses personal data of our employees. For example, their names, address information, contact details and salary data. The need to collect such data is often mandatory by law for employers. In addition to the legally required data, CSL may use personal data, which is accrued automatically, as a by-product of employees' everyday use of digital equipment and applications provided by the employer, such as emails. In accordance with applicable laws, CSL established appropriate security measures for the sensitivity of the data and the risks associated with using such information.



3

Safety and Quality of Our Products

In this section

3.1	Research and Development	26
3.2	Bioethics	27
3.3	Pharmacovigilance	31
3.4	Quality	31
3.5	Supply Chain	32
3.6	Human Rights	33





CSL's Commitment:

CSL is committed to improving and saving the lives of patients with rare and serious diseases and protecting public health through the development, manufacture and reliable supply of high-quality medicines.

We will:

- consistently apply pharmaceutical industry best practice standards for the conduct of research and development involving animals and clinical trials with patients or individuals;
- maintain quality management 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 insource, are actively committed to these same principles;
- notify regulatory agencies and other stakeholders promptly and as appropriate regarding any safety or quality issues with any of our products;
- work with the World Health Organization (WHO) and governments, as appropriate, to investigate and prevent any instance of counterfeiting of our products; and
- implement practical business systems that protect the rights of individuals who come into contact with CSL.





3.1 Research and Development

It is our mission to discover, develop and deliver innovative therapies that improve patients' quality of life. Our commitment extends to ensuring our medicines are safe and effective solutions that benefit patients and physicians by addressing unmet medical needs.

To achieve this, our researchers and employees are dedicated to:

- partnering with patients throughout the development life cycle;
- conducting ourselves with appropriate regard to bioethical principles;
- undertaking research into novel disease mechanisms and products utilising advances in science and technology;
- supporting the conscientious use of animals in research only where no other scientific or regulatory acceptable alternative exists to demonstrate the safety and effectiveness of the investigational compound;
- always conducting our clinical trials in accordance with consensus ethical principles derived from international ethics guidelines, such as the International Council for Harmonisation (ICH) E6: Guideline for Good Clinical Practice (GCP) and the World Medical Association Declaration of Helsinki and the CIOMS International Ethical Guidelines for Biomedical Research Involving Human Subjects;
- producing valued health enhancements or advancement of scientific knowledge while seeking to identify and minimise relevant risks to recipients of our medicines;
- carrying out research in a transparent way, with respect for those participating in our clinical trials;
- striving to further scientific and medical knowledge through transparent publication of all clinical trial results according to accepted international guidelines;
- achieving timely medicinal product registration to bring our novel treatments to patients as soon as possible; and
- adhering to global quality standards.

3.1.1 Patient Focus and Public Health

Patient Focus is one of our core values and is a vital foundational element of all our work. We believe patients and caregivers know best what makes a meaningful difference in the management and treatment of their disease.

We are committed to developing and tailoring strategies and processes for patients and caregivers to take on board their specific perspectives of our development programs and studies. We actively work with patient organisations to develop unique programs and activities for patients and the protection of public health. We apply our deep understanding of our patients and their families to create our own programs. In addition to building that sense of empowerment and community, we partner with these groups to improve and expand educational and outreach efforts about rare and serious diseases.

We work with government authorities and other stakeholders to support the protection of public health and explain the unique needs of the rare disease community in an effort to help them to understand the real value our therapies provide. We also aim to ensure patients have access to the care and therapies they need to lead a full and rewarding life.



3.2 Bioethics

'Bioethics' refers to the application of ethics in the discovery, development and production of medicines, and healthcare more broadly. Bioethical principles guide us in how to conduct ourselves responsibly and ethically in our work to the ultimate benefit of society. At CSL, we act in accordance with our Code and our Values and carefully consider the ethical implications of our activities to deliver on our commitment to patient and public wellbeing.

Our respect for sustainable ethical conduct is paramount. However, we are pragmatic and acknowledge that our practices may need to adapt to potential challenges arising from external influences. These include:

- social trends;
- scientific advances in biotechnology and research; and
- public health needs.

Additionally, we recognise the need to continually assess and improve our internal ethical standards and processes. CSL has implemented specific oversight through a Bioethics Advisory Forum, to assess and proactively address emerging bioethical dilemmas related to research and development.

CSL's Bioethics Advisory Forum is supported by select external bioethicists and, when needed, serves as an advisory body to our research and development teams on bioethical issues. The forum provides an opportunity for a range of bioethical topics to be raised and debated to help inform CSL's decision-making, and for new bioethics-related initiatives, policies and guidelines to be considered.

3.2.1 Advances in Science and Technology

We strive to turn innovation into solutions and within research and development, we use the latest developments and applications in the scientific field to discover and develop new critical therapies to fulfil unmet medical needs.

Recent advances in the area of gene therapies are unlocking novel opportunities for drug development; however, the associated technologies raise complex issues.

3.2.1.1 Use of Foetal and Embryonic Tissue and Stem Cells

CSL does not undertake research using stem cells from human foetal or human embryonic tissue or participate in studies that do so. Nor do we utilise them for our products. We do not practise human gene therapies that target the germline or fund external studies that do so.

3.2.1.2 Use of Genetically Modified Organisms

We routinely use standard, genetically modified organisms (GMO) in research and development, manufacturing and quality control processes to develop recombinant proteins. All research and development with GMO is conducted to required regulatory standards and under full risk assessment with highest conditions of safety concerning use, storage, containment and appropriate disposal of waste or used materials.

3.2.2 Clinical Trials

Clinical trials are research studies conducted to ascertain if medical treatments can improve people's health. Before a new medicine is made available to the public, it must undergo rigorous investigation through a series of well-designed clinical studies to assess efficacy and safety, which are then evaluated by regulatory agencies.

We commit to conduct clinical studies responsibly. Study participant safety and confidentiality is paramount, and we apply high internal standards and oversight to ensure this. Furthermore, we have mechanisms in place to ensure the accuracy, trustworthiness and security of the data that our studies generate.

At CSL, we believe it is our ethical responsibility to give healthy volunteers and patients participating in our studies respect and support for their wellbeing along the continuum of study activities, from study design to recruitment, enrolment, study execution and completion. All CSL staff supporting our clinical studies as well as our investigators, site personnel and vendors that interact with our public and patient communities are expected to conduct themselves with integrity, and to apply the highest standards of medical care and respect for patients at all times.

CSL requires all clinical studies with which it is associated to meet internationally agreed ethical and data quality standards, which outline the community's expectation of pharmaceutical companies for conducting and managing clinical trials. We demand the same ethical standards wherever we conduct our clinical studies. We only conduct studies in countries where these standards can be met and in facilities we have evaluated and deemed to have the appropriate medical and research infrastructure.



3.2 Bioethics continued

The first time a medicine is given to people (known as First in Human [FiH] studies) is a critical time in clinical development. These FiH studies are particularly important to further our knowledge of disease and the potential of the investigational approach, and in safeguarding participants' health and wellbeing. CSL takes this responsibility seriously and has processes, which are aligned with regulatory guidance, in place to enable decision-making and the monitoring of study participants.

For all CSL-sponsored studies, a cross-functional group of internal experts ensures all studies are scientifically justified and comply to our highest level of safety governance. All available data is reviewed to confirm a favourable benefit/risk ratio has been assessed prior to the study commencing. This is in keeping with our commitment to the protection of study participants.

CSL will conduct interventional Phase III clinical studies in patients only in countries where:

- CSL intends to seek approval to make the investigational medicine commercially available;
- the product being studied is already approved and available in that country for an alternate indication and/or population and there is a plan to obtain approval for the new indication; or
- the investigational medicine is already approved for the indication under study and it is available or there is intent to make it so (e.g. phase IV studies).

For rare diseases, it is imperative that new investigational medicines are made available to children as soon as possible. CSL is committed to including paediatric subjects in our clinical programs when it is ethically justified and feasible to assess the efficacy and safety of our medicines. This is determined in collaboration with the appropriate regulatory authorities. Consistent with all CSL clinical studies, CSL-sponsored paediatric studies meet all required laws and regulations.

It is important that those considering participation in a clinical study are provided transparent and understandable information on the aims of a study, and the risks and potential benefits of participation, as well as treatment options. This is achieved through an informed consent process whereby information is clearly shared with all participants in our studies to enable their decision-making. Participants are also informed they are free to withdraw at any time, with no reason provided and with no adverse consequences to their access to medical care. If new information pertaining to the conduct or the benefit/risk assessment of the study comes to light, we share such information promptly with participants.

We believe individuals should not be the subject of clinical trials without the protection of their fundamental rights as patients and the assurance of the protection of their individual study data. CSL does not permit any study procedures to be carried out until the study participant, or legally accepted representative, has freely provided informed consent.

CSL conducts internal quality audits of all aspects of clinical trials and supports inspections by global health authorities.

3.2.2.1 Clinical Data Transparency

CSL believes in the importance of making clinical studies and clinical study results available to the medical profession, potential study subjects and the public. Furthermore, we ensure we disclose balanced, complete, accurate non-proprietary information about our registered clinical studies, regardless of outcome. We do this in a timely manner and through a variety of mechanisms.

- CSL-sponsored studies are listed on our corporate website. We also prospectively register all interventional studies in patients or healthy volunteers on a public clinical trial registry which is recognised by the International Committee of Medical Journal Editors (ICMJE). CSL-sponsored non-interventional studies are registered according to local requirements and standards.
- Summary results from CSL-sponsored clinical studies are disclosed within 12 months of the final patient's last visit, unless otherwise mandated, and according to local requirements and standards. This includes results of studies of discontinued products and studies discontinued for safety or efficacy reasons.
- We endeavour to share study results with patients who participate in our clinical studies by publishing plain-language summaries for study participants via a publicly available independent web service. Additionally, upon request, we will collaborate with investigators who wish to share an individual's results with their patient. Local regulations and standards are used to determine the appropriate response to such requests.



3.2 Bioethics continued

Q

I have received a request from a research hospital for clinical outcomes from a recently completed CSL-sponsored clinical trial. They believe our results will help them further develop a lifesaving therapy. I have access to such information, can I share it?

A

No. The results must not be shared. CSL clinical study results are disclosed in a controlled manner, according to local requirements and standards, regardless of the outcome. CSL is committed to posting summary results from all studies in patients within a year of the clinical trial completion on publicly available websites and registries such as clinicaltrials.gov. If the trial involved patients under the age of 18 years, the results are posted within six months of the trial completion. Researchers interested in the study results should be directed to such registries.

3.2.2 Clinical Trial Data Privacy

In support of researchers who wish to examine study data more closely or to combine it with other studies in meta-analyses, CSL has adopted a process for evaluating requests for anonymised patient-level data. Ensuring personal privacy is paramount and CSL adheres to European General Data Protection Regulations and locally applicable requirements when handling individual personal data.

Any patient-level data shared publicly – for example, with regulators or investigators, or in presentations or publications – is anonymised to protect personally identifiable information. CSL does not provide access to patient-level data if there is a reasonable likelihood that individual patients could be re-identified.

In instances where unsolicited personal data is voluntarily shared with us, for example, as part of a patient-generated enquiry or when a member of the public reports an adverse event, we do not use this information for any other purpose than to manage the query or report. Personal data will not be shared with any other party unless we are legally obliged to do so (e.g. by regulatory authorities) or when a third party acts on behalf of CSL as a data processor.

CSL retains personal data for as long as we reasonably consider necessary for achieving the purposes set out above and as is required and/or permissible under applicable law.

Q

A participant in a recently completed clinical trial has asked for any and all data we have on them while they participated in the trial. How do I manage this request?

A

Clinical trial participants are informed, at the time informed consent to participate in a trial is obtained, that access to any data can only be obtained from their physician and/or participating clinical trial institution. CSL cannot link data to the identity of the trial participant. To support fulfilment of their request, the participant should be directed to contact their treating physician or institution.

3.2.2.3 Access to Investigational Medicines

An investigational medicine is one which has not yet received required health authority (e.g. US Food and Drug Administration) approval and, until completion of clinical studies, their benefit risk profile is not fully understood. Under these circumstances, CSL only supports providing access to its investigational medicines in a clinical trial setting. CSL's policy on this can be found on [CSL.com](https://www.csl.com).

For patients who complete a CSL clinical trial in a serious or life-threatening condition, there can be certain instances where CSL will endeavour to ensure continuation of care between the end of the clinical study and until the product under investigation is approved in the patient's country. CSL clearly informs all patients if this will or will not occur, and under what conditions, as part of the informed consent process for a given study.



3.2 Bioethics continued

3.2.3 Animal Welfare

At CSL, we support the conscientious use of animals in research only where no other scientific or regulatory acceptable alternative exists to demonstrate the safety and effectiveness of an investigational compound. However, the present state of scientific knowledge and regulatory requirements mean that evaluation in animals is often critical to ensure the quality, efficacy and safety of the medicines we discover.

CSL is strongly committed to use animals in a humane and ethical manner and we are committed to maintaining the highest standards of welfare for all animals involved in our research. We apply applicable local laws and international codes of practice to all animal studies and require this of any third parties acting on our behalf.

Prior to conducting any animal research, an Animal Ethics Committee (AEC) or applicable local ethics and governance board reviews the scientific need and ensures all use is carefully planned and conducted in such a way as to maintain the highest standards of welfare for animals involved in our research. The respective animal ethics governance ensures 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 respective animal ethics governance body has approved the:

- scientific procedures;
- premises; and
- technical qualifications of persons involved in the research.

Similarly, we expect any third-party organisation we engage to conduct animal-based research on our behalf to treat animals according to the highest animal welfare standards, in line with our own commitments.



3.3 Pharmacovigilance

All medicines have the potential to cause adverse events in some patients. At CSL, it is our priority to understand the potential for adverse events to our medicines and to assess these alongside the therapeutic benefits of the medicines. This is achieved through the application of pharmacovigilance, the practice of monitoring the effects of medical drugs.

To ensure that every CSL product is both effective and safe, we have established systematic processes designed to optimise patient safety throughout the lifecycle of a medicine.

The benefit-risk profiles of our products are derived from available safety and efficacy information. This information comes from pre-clinical data; clinical studies supporting approval by health authorities; extensive programs of post-approval clinical studies; scientific publications; and healthcare providers, patients or consumers once the medicine is approved and in clinical use. Furthermore, all CSL employees receive training in adverse event reporting and are obligated to report should they become aware of an adverse outcome with one of our medicines.

We undertake sophisticated continuous monitoring and analyses of adverse events, which helps us understand our medicines' safety profiles. We can assist to identify potential side effects before they occur, enabling appropriate preventative strategies to be designed and implemented.

The quality of our processes and systems are regularly audited internally and inspected by major regulatory authorities.

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.

3.4 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, manufacturing and supplying quality products that benefit public health and improve and save the lives of patients.

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

Similarly, training of all employees is critical to the consistent, effective collection of plasma and production of our medicines. CSL directs significant resources towards education and engagement to assure all employees are properly qualified to perform their work in accordance with applicable 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), good distribution practices (GDP), good pharmacovigilance practices (GPV) and other similar standards applicable to the pharmaceuticals industry.

CSL's Global Quality Management System (QMS) provides the framework for ensuring regulatory requirements for the entire product lifecycle across our operations. The QMS contains policies and procedures to manage our business processes across all functions, our partners and suppliers, product manufacture, distribution and sales, and the ongoing monitoring of product safety in the field.

Regulatory agencies conduct regular and rigorous inspections of our manufacturing facilities to assess our systems and ensure our products meet the stringent compliance requirements of applicable regulations.



3.5 Supply Chain

3.5.1 Quality in the Supply Chain

CSL's supply chain in its simplest form involves third-party 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 GMP, GDP and GPV.

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 GMP and GDP requirements.

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 and quality. 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.

3.5.2 Supply Chain Management

CSL operates an integrated global supply chain involved in the development, manufacture and distribution of lifesaving medicines.

We invest in developing long-term relationships and identifying third parties that best meet CSL's requirements. This is particularly important because of the specialist and technical nature of the materials and services we require to produce our products.

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, and with the same internationally accepted best practices that we comply with. We also require third parties to comply 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 marketplace and supporting principles of fair competition;
- 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.

3.5.3 Counterfeit Products

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 identifiers to provide simple and prompt verification that a product is genuine in the supply chain and by healthcare professionals. In addition, the use of tamper-evident packaging provides additional security of a product's integrity to the patient.

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

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. 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 applicable laws and regulations as well as the Code and related policies. This includes competitive sourcing principles, vendor risk assessments and supplier performance management processes. Your relevant sourcing contact will assist you through the process.



3.6 Human Rights

CSL recognises that we have a responsibility to respect the rights of all individuals with whom we interact, including our patients, clinical trial participants, plasma donors, healthcare professionals, and employees.

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

Where practical and of mutual benefit, CSL will partner with stakeholders including industry associations, and government and non-government organisations to continually improve the human rights practices of its suppliers and partners.

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.

3.6.1 Child Labour

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

3.6.2 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 are not involved in any way with breaches of these rights.

Further rights for clinical trial participants are detailed in section 3.2.2 'Clinical Trials'.

3.6.3 Donors

We recognise that plasma and blood donors are important stakeholders in many parts of our business and are vital to ensuring the supply of safe and effective therapies to patients. We respect and value the health, time and safety of our donors, and are committed to treating them with respect and courtesy.

In full compliance with laws and regulations, CSL will continually seek opportunities to improve the plasma collection process, ensuring we deliver a high standard of donor experience.

3.6.4 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, transparent and timely manner.

We employ industrial relations professionals and devote resources and effort to build and maintain positive working relationships with organised labour groups that represent CSL employees in various locations. We respect our employees' right to be represented by these external and internal labour organisations.

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

3.6.5 Legal Entitlement and Minimum Wage

We comply with workplace laws in all of the geographies and working environments in which we operate, and our employees 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.

3.6.6 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 supplier whom 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 this supplier?

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 that supplier.



4

Safe, Fair and Rewarding Workplace

In this section

4.1	Workplace Standards	36
4.2	Professional Behaviour	39
4.3	Employee Rewards	41



CSL’s Commitment:

CSL is committed to having a safe, fair and rewarding workplace, which is exemplified by our employee brand.

Our employee brand – Promising Futures – represents our commitment to having a diverse, global workplace where people may fulfill their career aspirations, realise their potential and be inspired to be part of a purpose-driven company with a values-based culture.

We have an ethical and inclusive culture where all employees are respected, valued and able to freely share their perspectives, experiences and ideas. We have zero tolerance for harassment or discrimination. CSL leaders are expected to create a culture that appreciates and leverages differences, build diversity into their teams and role model CSL’s Values.

We are also committed to providing a workplace that is safe and supportive of employee wellbeing. We recognise the value of work-life balance and consider it in development of our policies. We also strive to support flexible working arrangements for our employees where business requirements allow.

These commitments help maintain our reputation as a values-driven organisation that is an attractive employer and provides a stimulating and engaging work environment that develops, engages and retains employees.

Our focus is on all employees as we define diversity in the broadest of terms, including but not limited to gender, nationality, ethnicity, disability, sexual orientation, gender identity, generation/age, socioeconomic status, religious beliefs, and professional and educational background, as well as global and cultural experiences.

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 inclusion and belonging in the workplace;
- ensure that remuneration always meets or exceeds legal standards and rewards and recognises employees for performance in alignment with market practices;
- provide support and opportunity for professional development and career progression;
- protect the health and safety of our employees and other persons present on our premises;
- provide appropriate benefits across the areas of retirement, health, personal leave and wellbeing;
- ensure our employees are able to seek representation without fear of intimidation, retaliation and harassment; and
- where possible, provide our employees with access to professional and independent counselling programs to support them through periods of difficulty.

4.1 Workplace Standards

4.1.1 Talent Management

CSL seeks to provide career opportunities for committed, passionate, qualified people in order to enjoy the business benefits of having a strong, diverse and global workforce. We employ 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 and fulfil their unique potential. We value the varying abilities and experiences that our employees contribute to CSL. 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 contingent workers, 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 applicable legal, tax and workplace health and safety obligations.

CSL will prioritise permanent employment over the engagement of contracted contingent workers for extended periods of time.

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 Workplace Standards continued

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, sexual orientation, and any other criteria protected by applicable law or company policy. We will not tolerate harassment in any form, including bullying and occupational violence in any workplace context, including off-site conferences, training, social events or through social media. Third parties who work with CSL, including vendors, suppliers, contingent workers, contractors and consultants, are also subject to and expected to comply with our EEO and workplace harassment policies.

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 not tolerate harassment, retaliation or discrimination of any kind in the workplace, and that possible disciplinary action, up to and including termination of employment, may be imposed for breaches of the policy;
- establish transparent procedures that are consistent with the duty to act fairly 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

One of my colleagues has told me they are homosexual and I have heard them being subject to jokes and negative comments about their lifestyle. What should I do?

A

Workplace harassment is against our Values, 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 'speak up' process to report concerns. Please refer to the CSL intranet for further information.

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 viewpoints of interested parties;
- 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 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.

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 'speak up' process to report concerns. Please refer to CSL's intranet for further details.

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.

4.1.5 Termination and Separation

When CSL terminates an employee, we will do so in a manner that is consistent with applicable local laws and 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 Behaviour

4.2.1 Mutual Respect

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

This includes:

- prohibiting intimidation, discrimination, 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
- prohibiting retaliation or reprisal of any kind as a result of an individual (or group) reporting legitimate concerns 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. Employees should not disclose or use such information except for a CSL-approved purpose and, in the case of confidential information disclosed to CSL by a third party under an obligation of confidence, in accordance with any contractual terms.

Information that is covered includes but is not limited to:

- CSL pricing policies;
- strategic and product development plans;
- financial information;
- customer information;
- employee information;
- inventions and discoveries;
- confidential information disclosed to CSL by third parties under an obligation of confidence; and
- any other information or trade secrets deemed by CSL to be confidential and proprietary.

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 be payable. In this case, the consideration payable will be the minimum payable under the applicable local laws.

Q

A healthcare professional with whom I am good friends is always anxious to provide the best available treatment and information to their patients. They have 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 them 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 provide to that which has already been released into the public arena.

4.2 Professional Behaviour continued

4.2.3 Employee 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. This enables employees to benefit from the total employee experience of working at CSL and to engage in work-related activities outside their day-to-day responsibilities, as desired.

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, culture 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.

We recognise that our employees also engage in communications outside CSL, leveraging various social media channels. Our Global Social Media Policy guides employees regarding appropriate external communications as they pertain to CSL-specific content.

4.2.4 Drugs and 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.

We understand our employees may have health conditions requiring the use of medicine during working hours and respect the confidentiality of the patient and physician relationship. However, under no circumstances can employee safety in the workplace be jeopardised. We will take respectful and lawful measures, as needed, to ensure employees are functioning in a competent and safe manner.

Managers responsible for CSL functions must ensure that the service and consumption 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 upon request. CSL encourages all employees who believe they may have a drug or alcohol dependency problem to feel comfortable approaching their CSL HR contact to seek help. All such requests will be handled confidentially.

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

I am concerned about a work colleague whose behaviour on occasion suggests that they are under the influence of alcohol while on duty. I know they are experiencing stress in their home life and do not wish to exacerbate their personal situation but I fear that their and their 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 or HR contact. 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 all employees understand how they can contribute to the success of CSL. That understanding is central to our performance management system, which includes:

- ensuring that the performance standards and expectations for each employee are communicated and understood;
- making sure individual objectives, where applicable, are achievable and are reviewed with regard to both business outcomes and CSL Values;
- encouraging communication and collaboration between the employee and line supervisor/manager, relevant colleagues, teams and stakeholders in relation to reviewing performance and demonstration of the CSL Values;
- establishing a performance management framework comprising systems and procedures that support the effective management of these practices in all of our businesses;
- having leaders in place who exhibit the standards and behaviours of CSL's culture and role model the CSL Values while coaching their teams to do the same; and
- training managers on how to practise effective performance management through techniques such as setting objectives, providing feedback and coaching and conducting performance and remuneration reviews.

Guidance on CSL's annual performance management process can be found on CSL's intranet or directed to CSL's HR Service Centres.



I established a work plan 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?



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 work plan was created, any difficulties experienced, and your future work plan and development needs. It is also an opportunity to discuss how you have demonstrated the CSL Values. Further guidance regarding annual performance assessments will be provided by CSL HR for your region.

4.3.2 Remuneration Philosophy

At CSL, we reward fairly and competitively. We leverage a market-based approach to offering competitive rewards, always keeping in mind alignment between employee and shareholder interests. We have instituted a global career framework to make our job structure transparent and to better compare jobs to the external market to ensure rewards are market driven. An employee's remuneration is directly related to his/her position, to other employees in a similar position and to the local market practices.

We focus on equal pay for equal work and have audit procedures in place to ensure there is no bias in our remuneration practices.

We use a consistent job architecture across the CSL Group, enabling comparison of job size, and we monitor the market value of roles across different locations.

Our performance management framework involves the establishment of performance objectives and values-based behaviours. These are formally reviewed twice per year and through regular conversations between a manager and employee, and management of performance-related remuneration. We have a pay-for-performance culture, and living our CSL Values is a non-negotiable performance expectation.

With our international footprint, in order to attract, compete for, motivate and retain employees, CSL offers remuneration which is fair, equitable and market competitive in the countries and industries in which we operate. Executive remuneration packages include fixed remuneration and performance-related rewards in the form of short-term cash incentives and long-term equity incentives aimed at aligning the interests of leaders and shareholders.

In the countries in which we operate, consistent with local market practice or applicable laws, CSL will make a contribution to employee retirement plans. Other benefits are made available based on market practice.



4.3 Employee Rewards continued

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

We realise the commitment our employees make to the company. As such, we recognise our employees for delivering our promise to patients, protecting public health and bringing our Values to life. We celebrate both the effort that is required to achieve real results and the results themselves.

Across CSL, we recognise continued good service of employees over a series of service milestones.

4.3.4 Learning and 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 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; and
- 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 including dismissal.

Misconduct of a serious nature may result in immediate termination of employment. 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, or other internal policies and procedures; or
- otherwise inconsistent with the continuation of employment.

The action taken in response to misconduct will depend on the severity of the situation and will be consistent with workplace policies and applicable legal requirements. In all cases, employees will have the opportunity to respond to allegations of misconduct.

5

Community

In this section

5.1	Community Contributions	45
-----	-------------------------	----





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.

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.



5.1 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 the following approach.

Support for Patients

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

Support for Innovation and Science

- 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

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. The policy also sets out procedures for managing unsolicited sponsorship requests. 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

In this section

6.1	Climate Change	48
-----	----------------	----



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.

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.

CSL’s policy describes our environmental commitments and provides the setting for our environmental objectives and targets.

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



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

In this section

7.1	Framework of Responsibility	51
7.2	Raising Concerns	52





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.

We will:

- ensure that all employees have access to the Code by translating it into the main local languages where we operate and distributing it to every member of staff – new and existing;
- ensure the Code is readily available to third parties;
- ensure our leaders model and demonstrate the behaviours expected of our employees;
- 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);
- ensure processes are in place to manage breaches and such breaches are disclosed to management; and
- seek and respond to feedback from our employees and other stakeholder groups about potential improvements to the Code.

7.1 Framework of Responsibility

CSL Board	<ul style="list-style-type: none"> • Approves the Code and sets review milestones. • Models and demonstrates behaviours expected of our employees.
Global Leadership Group	<ul style="list-style-type: none"> • Raises awareness, ensures accessibility and monitors compliance. • Models and demonstrates behaviours expected of our employees.
Office of the Company Secretary	<ul style="list-style-type: none"> • Custodian of the Code; oversees its review and development. • Facilitates reporting on compliance with the Code to the Board.
Corporate Responsibility Steering Committee	<ul style="list-style-type: none"> • Reviews and recommends improvements and facilitates stakeholder feedback. • Oversees external disclosures related to compliance with the Code.
CSL Ethics & Compliance/CSL Legal/CSL HR	<ul style="list-style-type: none"> • Oversee training requirements and manage breaches/reports of non-compliance. • Support supervisors/managers with enquiries and actively support reviews of the Code.
Supervisor/Manager	<ul style="list-style-type: none"> • Ensures employees receive the Code and comply with training programs. • Monitors adherence to the Code and supports employees with questions/concerns. • Models and demonstrates behaviours expected of our employees.
Employees	<ul style="list-style-type: none"> • Review the Code and participate in training programs. • Seek clarification when required and raise issues of non-compliance. • Demonstrate expectations set by the Code.

7.2 Raising Concerns

CSL has prepared this Code with the intent of fostering a positive and transparent relationship with our employees, contractors and other third parties. However, we recognise that there may be times when employees, contractors and other third parties observe instances of potentially inappropriate conduct. To facilitate ‘speaking up’ in an environment without fear of reprisal, retaliation or detriment, we maintain a CSL Speak Up Policy and promote proper use of procedures for our employees, contractors and other third parties to report (anonymously where permitted) situations which may raise concerns under this Code or relevant CSL policies, standard or Values.

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 suspected 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 Ethics & Compliance or CSL Legal in the first instance. If you are not comfortable speaking directly to a senior manager or CSL Ethics & Compliance or CSL Legal, our CSL Speak Up Policy lists various reporting processes that could be used to raise concerns. Please refer to CSL's intranet site or CSL.com for further ‘speak up’ contact and reporting details.



1
Our Purpose
and Values

2
Business
Integrity

3
Safety and Quality
of Our Products

4
Safe, Fair and
Rewarding Workplace

5
Community

6
Environmental
Management

7
Compliance
with this Code

Glossary



8

Glossary





At-will employment:

Employment that may be terminated at the will of either the employee or the employer, at any time, for any legal reason, with or without notice.

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).

Business records:

Information created, received, or maintained by or on behalf of CSL, including by its employees, contractors and agents, for the purpose of or relating to the transaction of CSL's business, or in the course and scope of complying with CSL's legal and/or regulatory obligations. Records include all forms of communication, correspondence, data, agreements, documents, presentations, files, books and logs, regardless of physical form, characteristics or location, including specifically paper, electronic, audio and all other media.

Collaborators:

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

Confidential and restricted confidential information:

Any proprietary information (information generated by or for CSL, or information disclosed to CSL by a third party under an obligation of confidence), the unauthorised disclosure of which could cause damage to the interests of its owner, be that CSL or a third party.

Conflict of interest:

An actual conflict of interest occurs when an employee's private interests influence the employee's decision or actions in the performance of their duties for CSL. A potential conflict of interest occurs when an employee's private interests could improperly influence the employee's decisions or actions in the performance of their duties for CSL.

Data classification:

CSL classifies its information assets into three categories.

1. Public – may be shared broadly inside and outside CSL. Disclosure presents no risk to CSL business operations. Examples include e-Detail information, public service announcements and new donor centre openings.
2. Confidential – presents moderate business risk if inappropriately shared. Examples include changes to business operations, management changes, policies and standards.
3. Restricted confidential – presents high business risk if inappropriately shared. Examples include financial results prior to public disclosure, product pricing information and research data.

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 or other criteria protected by applicable law.

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 licence).

Foetal:

An unborn baby, and distinct from embryo, which is typically described as the stages of development from weeks one to nine post conception.

Freedom of association or representation:

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

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 marketplace, 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, trade secrets, etc.



Investigational product:

A form of active ingredient or placebo being tested or used as a reference in a clinical trial.

Legal hold order:

An instruction, issued by a CSL Legal officer, that temporarily suspends the Global Records Retention Schedule for the specific purpose of preserving certain records in anticipation of, or pursuant to, relevant investigation, litigation, audit or other legal or regulatory inquiry. Hold orders are managed in accordance with CSL's Global Legal Hold Order Procedure.

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.

Plasma donors:

Members of the public who donate their plasma to the CSL Group, which is subsequently used to produce lifesaving 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:

Confidential 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.

Stem cells:

A cell with the unique ability to develop into specialised cell types in the body.

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 confidential and is used in the owner's business and gives the owner the opportunity to derive an advantage over other persons who do not know or use it.

CSL Limited
45 Poplar Road
Parkville, Melbourne
Victoria 3052 Australia
Tel: +61 3 9389 1911
Fax: +61 3 9389 1434
CSL.com

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