

CLINIGEN

SUPPLIER CODE OF CONDUCT

'JOINING-THE-DOTS'



INTRODUCTION

Clinigen is committed to responsible business practices and conducting business with the highest ethical standards.

We also expect that suppliers, vendors, contractors, consultants and other third parties acting on our behalf (collectively, “Suppliers”) conduct business to the same standards and in compliance with all applicable laws and regulations. This code sets out the standards that we expect our Suppliers to uphold.



THANK YOU

for your commitment to upholding the standards set out in this code.



SUPPLIER CODE OF CONDUCT – OVERVIEW

RESPONSIBLE BUSINESS

WORKPLACE PRACTICES & STANDARDS



1. ETHICS AND COMPLIANCE

CLINIGEN DOES NOT TOLERATE ANY FORM OF CORRUPTION. SUPPLIERS SHALL FOLLOW ALL APPLICABLE LAWS & REGULATIONS.

ANTI-BRIBERY & CORRUPTION

Suppliers shall comply with all applicable anti-bribery laws and anti-corruption laws and shall never engage in bribery and corruption. Suppliers who deal with governments or government officials need to be extremely careful not to give rise to suspicions that they might engage in bribery or corruption.

Suppliers will not offer, promise, give (including facilitation payments), demand or accept bribes or other improper advantage, including excessive gifts and entertainment, in order to obtain, retain or give business. Supplier shall recognise that anti-bribery and anti-corruption laws may be applied internationally.

Business Integrity



Employment Standards



ANTI-TRUST & COMPETITION

Suppliers shall comply with all applicable anti-trust and competition laws, rules and regulations. Suppliers will not enter into agreements with competitors or engage in other acts that may unfairly impact competition, including, but not limited to, price fixing or market allocations.

ANTI-MONEY LAUNDERING

Suppliers shall comply with all applicable statutes governing the prevention of money laundering and not to take part in any money laundering or other fraudulent activity.

All business dealings must be carried out in a transparent manner and recorded accurately. Clinigen does not tolerate any actual or potential involvement by its suppliers in money laundering, terrorist financing, and/or market abuse.

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2. BUSINESS INTEGRITY

SUPPLIERS ARE EXPECTED TO OPERATE WITH INTEGRITY, TRANSPARENCY & CONTROL.

Ethics & Compliance

CONFLICT OF INTERESTS

Suppliers should avoid any situation or relationship that may involve an inappropriate conflict or the appearance of a conflict with the interests of Clinigen. Suppliers shall declare all and any conflict of interest in any business dealing to Clinigen.

DATA PROTECTION

Supplies must comply with all applicable data protection and privacy laws when collecting, processing, storing or otherwise handling the personal data of any individuals, including their own employees and the employees of their customers, suppliers, and business partners.

GIFTS AND HOSPITALITY

Suppliers shall respect the Clinigen communicated policies regarding gifts and entertainment and conflicts of interest when dealing with Company employees and representatives.

MANAGEMENT SYSTEMS

Suppliers shall operate an appropriate management system to support ongoing compliance with all applicable laws and regulations. This includes maintaining adequate documentation to demonstrate compliance and putting in place a system for employees and business partners to anonymously report concerns.

Trade Compliance



3. TRADE COMPLIANCE

SANCTIONS LAWS & REGIMES

Suppliers should seek to comply with all applicable sanctions' laws and regimes. To this end, Suppliers should put in place controls to comply with economic and trade sanctions applicable to their business activities and operations.

SUPPLIERS MUST SEEK TO COMPLY WITH ALL APPLICABLE TRADE LAWS & SANCTIONS

Business Integrity

Employment Standards

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TRADE CONTROLS

Suppliers are to comply with all applicable laws and regulations regarding importing, exporting, licensing requirements, sanctions, embargoes, boycotts and other trade restrictions.

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4. EMPLOYMENT STANDARDS

FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

Suppliers shall recognise and respect the rights of workers to organise and join associations by their own choice, and to bargain collectively. Suppliers shall, when the rights to freedom of association and collective bargaining are restricted by law, allow the development of parallel means of independent and free association and bargaining for all workers. Workers' representatives shall not be the subject of discrimination and shall have access to all workplaces necessary to carry out their representation functions. Suppliers are expected to follow non-retribution and non-retaliation principles.

SUPPLIERS SHALL ADOPT THE FUNDAMENTAL CONVENTIONS OF THE INTERNATIONAL LABOR ORGANIZATION (ILO).

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WAGES & WORKING HOURS

Suppliers are to pay employees according to applicable wage laws, including minimum wages and overtime hours. Suppliers are to pay workers in a timely manner and clearly communicate the basis on which workers are paid. Working hours for employees will not exceed the maximum set by applicable law or regulation Suppliers shall ensure employees receive paid annual according to applicable laws.

Trade Compliance ←

Human Rights →

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5. HUMAN RIGHTS

SUPPLIERS SHALL ACT IN ACCORDANCE WITH INTERNATIONALLY RECOGNISED HUMAN RIGHTS AND STANDARDS, INCLUDING THE INTERNATIONAL BILL OF HUMAN RIGHTS, THE ILO DECLARATION ON FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK AND THE UN GUIDING PRINCIPLES.

↑ Employment Standards

PREVENTION OF FORCED LABOR, SLAVERY & HUMAN TRAFFICKING

Suppliers shall be committed to practices to eliminate conditions that can lead to forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise. Suppliers are to comply with all applicable anti-slavery and human trafficking laws.

PREVENTION OF CHILD LABOR

Suppliers are not to use child labor. Suppliers shall not employ any persons who are younger than 15 years old, or who are younger than the age for completing compulsory education in their country of employment where such age is equal to or higher than 15. Young/Juvenile workers younger than 18 years old, shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety or morals.

ANTI-DISCRIMINATION & FAIR TREATMENT

Suppliers are to provide a workplace free from harassment and unlawful discrimination and provide fair and equal treatment in the areas of recruitment, hiring, training, promotion, compensation, discipline, discharge, and all other terms and conditions of work.

Suppliers are to treat every worker with respect and dignity and not subject any worker to harassment, intimidation, bullying, or any physical, sexual, psychological, or verbal abuse.

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↓ Health, Safety & Environment



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6. HEALTH, SAFETY & ENVIRONMENT (HSE)

SUPPLIERS ARE EXPECTED TO BE COMPLIANT WITH ALL RELEVANT HSE LAWS & REGULATIONS.

ENVIRONMENTAL

Suppliers are to conduct business in compliance with applicable environmental laws and shall operate in an environmentally responsible and efficient manner. In addition, they shall minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible and to engage in activities that reuse and recycle. Suppliers shall comply with all applicable environmental regulations. All required environmental permits, licenses, and information registrations shall be obtained and their operational and reporting requirements and restrictions followed.

HEALTH & SAFETY

Suppliers are to provide a safe and healthy workplace in compliance with applicable health and safety laws and establish policies and practices to minimise the risk of accidents, injury, and exposure to health risks. Suppliers shall conduct regular risk assessments and ensure safety Information relating to hazardous materials—including pharmaceutical materials—is available to educate, train and protect workers from hazards.

Ethics & Compliance ←

Human Rights →



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THANK YOU

Suppliers can report any suspected compliance or ethics concerns regarding Clinigen via the [Clinigen Business Ethics Helpline](#).

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