

DCN: BSI-FRM-1228 v. 1.1; Effective Date: 10/18/2023; Date of Next Review: 10/18/2026



Dear Distributor,

BioSpectra is committed to conducting our business in an ethical, responsible, and sustainable manner. We wish to do business with companies that share our belief that responsible business is part of being a healthy, ethical, and responsible Distributor to the Biopharmaceutical and Pharmaceutical industry.

Capital Investment as part of continuous improvement, new product launches to meet the evolving needs of our customers, and Supply Chain Security and Corporate Social Responsibility are all incorporated into our ongoing Strategic Plan and Initiatives. These elements are intrinsically woven within BioSpectra's commitment to achieve our mission to manufacture the highest quality, safest, and most sustainable pharmaceutical ingredients under the supervision of the most rigorous quality system while upholding the most stringent compliance standards. This is in support of our vision for a world with safe drugs and vaccines that deliver a consistent and reliable therapeutic effect with every dose.

As part of these initiatives, BioSpectra is aligned with many Global Initiatives. In our effort to be transparent, BioSpectra is registered with, and participates in, the Ecovadis platform to demonstrate our efforts to uphold and protect human rights and the environment, ensure ethical labor conditions and corruption-free business practices, and encourages other companies to do the same.

We expect our Distributors to act ethically, in accordance with widely accepted international standards of ethical and legal behavior in compliance with our Distributor Code of Conduct.

What is expected of business partners through this Code of Conduct?

The minimum expectations we hold for our Distributors are detailed in the 'Environment,' 'Social,' and 'Governance' (ESG) sections below. Where not specifically covered within the ESG sections we expect Distributors to fully comply with all laws across the countries in which they operate. Above and beyond the requirements detailed below, we also encourage Distributors to take meaningful action to adopt best practices around ESG issues as it applies to their business. This includes, but is not limited to, making public your commitments and producing material and transparent reporting on ESG issues.

Environmental

- **Environmental Legislation-** The Distributor shall comply with all environmental regulation applicable to the countries or regions in which they operate.
- **Product and Service Design-** The Distributor shall promote the safe and environmentally responsible design, production, handling, use, and end-of life treatment of chemical and ingredient products (as applicable).
- **Environmental Management-** The Distributor shall have environmental management systems in place to prevent material releases and pollution to air, water, and land.
- **Product Quality and Safety-** The Distributor shall use appropriate management systems to ensure the quality of products is maintained and that information is provided on safe handling.
- **Emissions Reduction-** The Distributor shall actively pursue reduction of their direct and indirect greenhouse gas emissions in line with recognized standards.

The information contained herein is the confidential property of BioSpectra. The recipient is responsible for its safe-keeping and the prevention of unauthorized appropriation, use, disclosure and copying.

DCN: BSI-FRM-1228 v. 1.1; Effective Date: 10/18/2023; Date of Next Review: 10/18/2026

- **Resource Use-** The Distributor shall actively pursue continual improvement on reducing resource use through a more efficient use of energy, water, and other natural resources which drives the reduction of emissions and other waste.

Social

- **Health & Safety-** The Distributor shall provide safe working conditions, manage occupational health and safety risk, comply with all applicable legal requirements, and operate in accordance with both government and industry standards appropriate to their activities.
- **Harassment & Discrimination-** The Distributor shall prohibit discrimination and harassment against any employee or applicant for employment because of race, color, religion, creed, sex, sexual orientation, gender identity, pregnancy, age, national origin or ancestry, genetic information, marital status, citizenship status, political affiliation, or any other consideration protected by national or local laws. The Distributor shall also ensure that employees are protected from any form of harassment or retaliation when acting in good faith upon filing a complaint or reporting practices contravening these laws.
- **Equality and Inclusion-** The Distributor shall commit and take action to ensure all recruitment, hiring, training, promotion, pay, and benefits practices are carried out without regard for any legally protected characteristics mentioned above.
- **Rights at Work,** and other ethical standards that promote respect for people everywhere, without discrimination, in whatever capacity they are connected to our business. The Distributor shall comply with all applicable employment laws and standards and commit itself to fair employment practices. We also expect our Distributors to prevent all forms of forced or bonded labor or child labor in their supply chain.
- **Substance Abuse-** The Distributor shall have a zero-tolerance policy for illegal substance abuse at work or working while under the influence of a substance.

Governance

- **Laws and Regulations-** The Distributor shall operate in full compliance with international, national, and local laws and regulations that are applicable to their business operations and obtain all the necessary permits.
- **Preventing Bribery and Corruption-** The Distributor shall uphold all laws relevant to countering bribery and corruption across the locations in which they operate. The Distributor shall refrain from any form of corruption. The Distributor shall respect that BioSpectra employees do not give or accept any gift or favor that could compromise or raise doubts about the neutrality of its business decisions or give the appearance of a bribe.
- **Antitrust and Fair Competition-** The Distributor shall uphold all antitrust and fair competition laws applicable to the locations in which they operate and implement and enforce strict policies in this area.
- **Conflict of Interest-** The Distributor shall disclose to BioSpectra all available information about conflict of interest including financial interest of a BioSpectra employee in any of Distributors' businesses.
- **Import and Export Compliance-** The Distributor shall under no circumstances export or import goods contrary to laws and regulations of the countries in which they operate. The Distributor shall complete and maintain accurate documentation of product country of origin, tariff classification, and value of imported and exported items.

The information contained herein is the confidential property of BioSpectra. The recipient is responsible for its safe-keeping and the prevention of unauthorized appropriation, use, disclosure and copying.

DCN: BSI-FRM-1228 v. 1.1; Effective Date: 10/18/2023; Date of Next Review: 10/18/2026

- **Trade Sanctions and Embargoes-** The Distributor shall comply with economic sanctions and trade embargoes of the US and with similar laws of other countries, whether they apply to foreign countries, political organization, or individuals. No Distributor, including any of its officers or directors, shall be included on any lists of terrorists or terrorist organizations compiled by the United States government or any other national or international body.
- **Conflict Minerals-** The Distributor shall operate in compliance with the Dodd-Frank Act and other applicable laws for the locations in which they source and operate. The Distributor shall also respond to any questionnaire on conflict minerals as required by BioSpectra.
- **Privacy-** The Distributor shall ensure that it collects, uses, retains, discloses, and disposes personal data in conformity with all data protection and privacy laws relevant to the locations in which they operate. This shall include data relating to BioSpectra.
- **Tax Evasion-** The Distributor shall adhere to all international laws, regulations, and standards with respect to tax evasion, fraud, and money laundering. Additionally, the Distributor shall not be complicit in the facilitation of tax evasion by a third party in any jurisdiction.
- **Transparent Accounting-** The Distributor's accounting records and supporting documents shall show a true, fair, and complete picture of the underlying transaction.
- **Whistleblower Process-** Shall be established and maintained.

Distributor Self-Assessment:

1. Does the Distributor have a Sustainability Program? (Yes / No / Other: _____)
2. Has the Distributor developed Sustainability Goals? (Yes / No / Other: _____)
3. Has the Distributor established their own Distributor Code of Conduct and cascaded throughout the supply chain? (Yes / No / Other: _____)
4. Has the Distributor conducted an assessment regarding environmental and social management and performance (i.e., EcoVadis, Maplecroft)? (Yes / No / Other: _____) If yes, please provide rating: _____.

DCN: BSI-FRM-1228 v. 1.1; Effective Date: 10/18/2023; Date of Next Review: 10/18/2026

Acknowledgement and Agreement to Uphold BioSpectra’s Distributor Code of Conduct:

Our Distributor Code of Conduct is an important aspect of our efforts to ensure that all the partners we work with have similar high standards and are continually working toward improving business practices.

You, as the Distributor, signs and returns the acknowledgement below to confirm that your business will operate in line with the requirements detailed in this Code of Conduct:

I am an authorized representative of and acknowledge receipt of BioSpectra’s Distributor Code of Conduct and have read and understood the provisions contained therein.

On behalf of _____, I agree to uphold the requirements of the Distributor Code of Conduct and meet all expectations contained therein, as applicable to our business.

I further commit to informing all appropriate management, staff, and employees of my company of the principles of the Distributor Code of Conduct and ensuring that each individual knows his or her responsibility to uphold its provisions in his or her daily work.

Authorized signatory name: _____

Signature: _____ Date: _____

Title: _____ Company Name: _____

You have reviewed your organization’s own Code of Conduct and can and do confirm that your organization’s own Code of Conduct currently meets or exceeds the requirements set out here.

I am an authorized representative of _____ and acknowledge receipt of BioSpectra’s Distributor Code of Conduct and have read and understood the provisions contained therein.

On behalf of _____, I confirm that our own Code of Conduct currently meets or exceeds the requirements set out in this Distributor Code of Conduct.

I further confirm that we are committed to enforcing our Code of Conduct to our management, staff, and employees and ensuring that each individual knows his or her responsibility to uphold its provisions in his or her daily work. We have processes in place to take disciplinary measures against those who violate our Code of Conduct.

Authorized signatory name: _____

Signature: _____ Date: _____

Title: _____ Company Name: _____

The information contained herein is the confidential property of BioSpectra. The recipient is responsible for its safe-keeping and the prevention of unauthorized appropriation, use, disclosure and copying.