

ENVIRONMENTAL, SOCIAL AND GOVERNANCE BUSINESS PARTNER/VENDOR CODE OF CONDUCT

OVERVIEW

Veristat is committed to improving the care provided to patients and their access to innovative drugs/devices whilst protecting their safety by supporting our clients in providing innovative solutions to meet their medical needs.

The success of a company's business is dependent on the trust and confidence the company earns from its employees, customers, and business partners/vendors and contractors and Veristat, as a responsible company, commits to carrying out its business in an ethical and sustainable way.

Veristat is fully committed to supporting and respecting human rights, and adheres to applicable sustainability-related laws. Veristat treats its external stakeholders with respect and expects them to be likeminded in complying with applicable laws and regulations, ethical business practices, and adhering to the requirements concerning labor, health, safety, and management and business in this Environmental, Social and Governance Business Partner/Vendor Code of Conduct ("the Code" or "this Code").

Veristat requires our business partners/vendors to either explicitly acknowledge and adhere to the principles embodied in the Code, or to assert in writing that the business partner/vendor complies with its own internal ESG code with principles similar to Veristat's code. The adherence to this document is a binding agreement and an integral part of the contractual foundation between Veristat and its business partners/vendors and a breach could lead to termination.

Business partners/vendors must ensure that their own business partners/vendors appropriately ensure compliance with these principles along their own supply chains.

Veristat must not accept any benefits/advantages from business partners/vendors, contractors, or consultants likely to positively influence Veristat's opinion on the performance of their service.

INTRODUCTION

“ESG” means Environmental, Social and Governance.

“Vendor” in this Code means any business or other entity that agrees to or does supply any goods, services or facilities to Veristat at any time.

“Business partner” in this Code means any entity having a contractual relationship with Veristat. The Business Partner is generally the asset owner and license holder of the respective medicinal product in regions where Veristat does not act as Marketing Authorization Applicant / Marketing Authorization Holder and / or is the company developing, manufacturing (including contract manufacturing), and supplying the product.

Veristat’s ESG policy is to ensure as far as applicable and reasonably practicable that its operations, activities and conduct, and those of its business partner/vendors, will be conducted with a commitment to:

- a) protecting and enhancing the environment by minimizing negative impact and maximizing positive impact on the environment;
- b) ensuring appropriate conduct towards, positive impact on and good relationships with employees, clients/customers, business partner/vendors and the community in which Veristat and its business partner/vendors operate; and
- c) conduct their business with integrity and high standards of business ethics, through appropriate structures, systems, processes and procedures.

(“ESG Commitment”)

The ESG Commitment is a fundamental principle of Veristat’s business.

BUSINESS PARTNER/VENDOR’S GENERAL ESG PRINCIPLES

In fulfilling the ESG Commitment, Veristat seeks to:

- comply with all applicable local and national laws, rules, regulations and other measures having the force of law that are relevant to any aspects of the ESG Commitment; and
- where it is practicable and appropriate to do so, establish and meet standards relevant to any aspects of the ESG Commitment which are higher than the standards imposed by law.

BUSINESS PARTNER/VENDORS’ COMMITMENT

This Code sets out the minimum standards that must be met by Veristat’s business partners/vendors in order to assist Veristat to maximize its ability to meet the ESG Commitment.

Each business partner/vendor is expected to:

- comply with this Code; and

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- adopt and implement policies, standards and processes fully consistent with the business partner/vendor's commitments set out under the Environment, and Social and Governance headings below.

These principles are not intended to replace, superseded or conflict with any applicable legal or regulatory requirement or contractual obligation with Veristat. Each business partner/vendor must determine how to meet and demonstrate compliance with these principles and expectations in this Code.

ENVIRONMENT

Business partner/vendors must be committed to providing safe working conditions and a healthy work environment. The business partner/vendor is expected to:

- comply with all applicable environmental protection laws and regulations in the regions they operate.
- where possible, reduce consumption of resources and improve efficiency of those resources.
- promote a culture of environmental awareness amongst all employees.
- manage waste generated from business operations according to the principles of reduction, re-use and recycling.
- manage and dispose of all waste in a responsible manner in ways that show concern for the environment.
- identify and assess emergency situations in all areas, minimize their impact by providing emergency response equipment and supplies, implementing emergency plans and response procedures, including regular emergency response drills in line with local legislation.
- comply with applicable quality regulations and standards for the markets in which products may be registered and distributed (e.g., Good Clinical Practice (GCP), Good Manufacturing Practice (GMP), Good Distribution Practice (GDP), and Good Pharmacovigilance Practice (GVP).
- implement sound security practices and processes across the supply chain.

LABOR AND HUMAN RIGHTS

Business partner/vendors are expected to be committed to ensuring the human rights of workers and to treating them with dignity and respect. The business partner/vendor is expected to:

- not infringe any internationally recognized human rights, including those recognized in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.
- provide and maintain a working environment free from all forms of discrimination, harassment and bullying, (e.g., union membership or political affiliation, gender, gender identity or expression, gender reassignment, sexual orientation, race, colour, caste, creed, religion, nationality or national origin, ethnicity or ethnic origin, ancestry, age, marital or pregnancy status, civil partnership or disability).
- not discriminate in selection, engagement, placement, training, promotion, transfer or compensation or other treatment or dealing with any employees on the basis of union membership or political affiliation, gender, gender identity or expression, gender reassignment, sexual preference, race, colour, caste, creed, religion, nationality or national

origin, ethnicity or ethnic origin, ancestry, age, marital or pregnancy status, civil partnership or disability or any other characteristic.

- permit employees' freedom of association, union membership and collective bargaining, in accordance with applicable laws, in order to protect or represent their interests.
- comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes, including the Modern Slavery Act 2015 and other laws etc. prohibiting forced or compulsory labour, child labour, bonded labour, prison labour.
- recognize the importance of diversity and inclusion amongst its workforce by adherence to all local laws, regulations and policies specific to equal opportunity and non-discrimination.
- comply with workplace health and safety laws and standards and taking steps to mitigate risks to health and safety in the workplace, prevent workplace hazards and work-related accidents and injuries. Appropriate equipment, facilities and services shall be provided to support worker safety, health, and well-being.
- pay workers according to applicable wage laws and agreed employment contracts, including minimum wages, overtime hours and mandated benefits.

ETHICS AND COMPLIANCE

Business partner/vendors are expected to act with integrity and conduct their business in an ethical manner. The business partner/vendor is expected to:

- ensure compliance with all applicable local and national laws and regulations, relevant standards and codes of practice relating both generally and in particular to transparency and corporate governance.
- promote strong oversight and transparency at all levels of its organization.
- establish and maintain high standards of business ethics conduct, and promote a culture of integrity, honesty, ethical and responsible conduct in its business activities and behaviours.
- ensure all financial books, records and accounts conform to generally accepted accounting principles. Records must be accurate in all material respects, must be legible, transparent, and reflect actual transactions and payments.
- comply with all applicable laws relating to bribery and corruption (including but not limited to the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act - 1977), prohibit any bribery or corruption of, or by, any of its officers or employees and require its goods and services supply chain similarly to comply with such laws and to prohibit their officers and employees from engaging in any bribery or corruption).
- prohibit any money laundering by any of its officers or employees.
- refrain from providing or offering anything of value that could be viewed as inappropriately influencing Veristat's business decisions or gaining an unfair advantage.
- apply fair business practices in compliance with all applicable anti-trust and competition laws
- acknowledge that shares of Veristat's customers may be publicly listed and that any information relating to Veristat's clients may potentially constitute material, non-public information within the meaning of applicable US securities and insider trading laws.
- comply with all applicable import and export controls, sanctions, and other trade compliance laws of applicable country(ies) where transaction(s) occur.
- avoid investment in or any other connection with (and prohibit its goods and services supply chain from investing in or having any other connection with) industries with a negative social impact, for example, gambling, tobacco, pornography or weapons manufacture/sales.

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- disclose any sanction, exclusion or other event that would make the business partner/vendor ineligible from participating in any government-funded program or contract.
 - comply with all applicable food, drug, cosmetic and medical device laws which may include, without limitation, the United States Food, Drug and Cosmetics Act, European Union Medical Device Regulations and the International Conference on Harmonization Guidelines.
 - comply with all applicable laws, regulations and guidance relating to the use of electronic systems for clinical trials.
 - comply with all applicable data protection laws and contractual requirements when processing any personal data on behalf of Veristat, maintaining appropriate privacy and data security measures to protect the integrity and confidentiality of information held on its systems to ensure that company, worker and patient privacy rights are protected. Ensure the protection, security, and lawful use of personal data and ensure that there is no unauthorized access to any such information by third parties including its goods and services supply chain.
 - undergo any qualification/requalification activities as necessary, in a timely manner and participate in ongoing monitoring efforts.

GOVERNANCE AND MANAGEMENT

Business partner/vendors shall implement management systems to facilitate compliance with applicable laws and the principles of this Code. The business partner/vendor is expected to:

ensure that it identifies and complies with all applicable laws, regulations, relevant standards, Veristat requirements, and codes of practice relating both generally and in particular to transparency and corporate governance.

- maintain and implement policies covering anti-bribery and corruption, code/s of conduct, conflicts of interest, privacy and human resources, as part of the governance structure of the business partner/vendor.
- allocate resources to satisfy the expectations of this Code.
- conduct periodic self-evaluations to verify compliance with applicable laws, regulations and this Code.
- ensure a process is in place for timely correction of any deficiencies identified by any audits, assessments, or inspections.
- maintain an ongoing process to obtain feedback on business partners/vendor practices related to this Code and to welcome and adopt improvement.
- have risk management mechanisms to identify and manage risks in all areas addressed by this Code of Conduct and, and to regularly review and update them.
- apply the principles outlined when selecting their own business partners/vendors and implement system to monitor business partner/vendor compliance.

DISCLOSURE

Business partners/vendors to Veristat must fully and voluntarily disclose material information, incidents or events which may affect Veristat's relationship/activities/products.

RAISING CONCERNS

Business partners/vendors are required to encourage employees to report concerns without fear of reprisal and take corrective action, if needed. A mechanism should be provided for employees to report suspected or actual violations of this Code, business partner/vendor policies or laws on a confidential basis. Channels for anonymous reporting should be provided, where permitted by law.

Any individual reporting a concern or suspected violation should not be retaliated against by the business partner/vendor. Veristat prohibits retaliation in any form against someone who has made a good faith report of a suspected violation of this Code, Veristat policy or applicable law or regulation.

Business partner/vendors are expected to take necessary corrective actions to promptly remedy any identified noncompliance with this Code. Business partner/vendor employees or contractors may report suspected violations of this Code to Veristat to their Veristat point of contact or directly to: protecteddisclosure@veristat.com.

Should a business partner/vendor be unwilling or unable to comply with this Code, Veristat reserves the right to terminate its business relationship where termination is allowed by local laws and contractual arrangements.

VIEWING AND UPDATING THIS CODE

Veristat will publish this Code (as amended from time to time) on its public website so that it is freely available to all business partner/vendors and others to view at any time.

Veristat will periodically review and update this Code, as necessary.