



BIOSPECTRA CODE OF ETHICS

BioSpectra is committed to conducting our business in an ethical, responsible and sustainable manner. Our “Code of Ethics” is an essential part of that. In this regard we have cascaded this Code down to our Suppliers and out to our Distributor and Commercial Partners (referred to collectively as “Business Partners”) as we only wish to do business with companies that share our belief that responsible business is part of being a healthy, ethical and responsible partner to the Biopharmaceutical and Pharmaceutical industry.

Capital Investment as part of continuous improvement, new product launches to meet the evolving needs of our customers, 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, 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.

As we demand from ourselves, we expect our Business Partners to act ethically, in accordance with widely accepted international standards of ethical and legal behavior in compliance with our Code of Conduct.

What is expected of BioSpectra employees and our Business Partners through this Code of Conduct?

The minimum expectations we hold for partners are detailed in the ‘Environment’, ‘Social’ and ‘Governance’ (ESG) sections below. Where not specifically covered within the ESG sections we expect our partners to fully comply with all laws across the countries in which they operate. Above and beyond the requirements detailed below, we also encourage our partners 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-** Compliance with all environmental regulation applicable to the countries or regions in which they operate.
- **Product and Service Design-** Promote the safe and environmentally responsible design, production, handling, use and end-of life treatment of chemical and ingredient products (as applicable).
- **Environmental Management-** Maintain environmental management systems in place to prevent material releases and pollution to air, water and land.

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- **Product Quality and Safety-** Maintain appropriate management systems to ensure the quality of products is maintained and that information is provided on safe handling.
- **Emissions Reduction-** Actively pursue reduction of their direct and indirect greenhouse gas emissions in line with recognized standards.
- **Resource Use-** 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-** Provide safe working conditions, manage occupational health and safety risk and comply with all applicable legal requirements and operate in accordance with both government and industry standards appropriate to their activities.
- **Harassment & Discrimination-** 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. 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-** 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 -** Including other ethical standards that promote respect for people everywhere, without discrimination, in whatever capacity they are connected to our business. Commitment to comply with all applicable employment laws and standards and commit itself to fair employment practices. We also expect our Partners to prevent all forms of forced or bonded labor or child labor in their supply chain.
- **Substance Abuse-** Zero-tolerance policy for illegal substance abuse at work or working while under the influence of a substance.

Governance

- **Laws and Regulations-** 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-** Uphold all laws relevant to countering bribery and corruption across the locations in which they operate. Refrain from any form of corruption. Respect the rule about acceptance or giving of 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-** 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-** Disclose all available information about conflict of interest including financial interest of any BioSpectra employee with regard to any of our Business Partners' businesses.

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- **Import and Export Compliance-** Under no circumstances export or import goods contrary to laws and regulations of the countries in which they operate. Complete and maintain accurate documentation of product country of origin, tariff classification, and value of imported and exported items.
- **Trade Sanctions and Embargoes-** 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 employee or Business Partner, 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-** Operate in compliance with the Dodd-Frank Act and other applicable laws for the locations in which they source and operate and respond accurately to any questionnaire on conflict minerals requested.
- **Privacy-** 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-** Adhere to all international laws, regulations and standards with respect to tax evasion, fraud and money laundering. Shall not be complicit in the facilitation of tax evasion by a third party in any jurisdiction.
- **Transparent Accounting-** Accounting records and supporting documents shall show a true, fair, and complete picture of the underlying transaction.
- **Whistleblower Process** – Shall be established and maintained.