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| <br><b>CONCEPT LIFE SCIENCES</b> |                                | <b>SOP-00057 Supplier Oversight v2</b> |
| <b>Site:</b> GLO                                                                                                 | <b>Department:</b> Procurement | <b>Process:</b> Quality Management     |
| <b>Effective Date:</b>                                                                                           | <b>Doc no.:</b>                | <b>Major Version:</b> 1                |
| <b>Author:</b> Laura Bratt                                                                                       | <b>Reviewer(s):</b> Dave Loder | <b>Approver(s):</b>                    |

## Supplier Code of Conduct

### 1. 1. Introduction

Concept Life Sciences is committed to conducting business ethically, responsibly, and sustainably. We recognise that our Suppliers play a significant role in supporting these commitments and expect them to maintain ambitious standards throughout their operations and supply chains.

This Supplier Code of Conduct ("Code") sets out the minimum standards expected of all Suppliers, contractors, consultants and business partners ("Suppliers") providing goods or services to Concept Life Sciences. Suppliers must comply with all applicable laws and regulations and are expected to operate in accordance with relevant internationally recognised Environmental, Social and Governance ("ESG") principles and standards.

### 2. Scope

This Code applies to all Suppliers, vendors, contractors, consultants, their employees, agents, subcontractors, and any third parties involved in delivering goods or services to Concept Life Sciences. Suppliers are responsible for ensuring that their own supply chains also adhere to this Code.

### 3. Business Ethics & Integrity

Suppliers are discouraged from offering gifts, hospitality, entertainment, travel, donations, or other benefits intended, or capable of being perceived as intended, to improperly influence a business decision. Any gifts or hospitality involving Concept Life Sciences personnel must comply with the gift policy.

Suppliers must prohibit, within their own operations and throughout their supply chain, any business dealings with sanctioned countries, entities, individuals, vessels, or organisations. Suppliers are expected to conduct an appropriate level of due diligence to identify and mitigate sanctions-related risks. In doing so, suppliers must comply with and consider all applicable sanctions laws and regulations in the jurisdictions in which they operate and/or provide services.

We expect our supply chain to have their own Anti-Bribery Policy which aligns with UK Bribery Act (2010) and ethical conduct policies, to be provided upon request.

We mandate that all gifts or entertainment be accepted or refused in line with our Gifts and Hospitality Policy, therefore discourage Suppliers from gifting for any reason or at any time which could constitute or be seen to constitute bribery.

Any conflicts of interest must be declared to the key stakeholder within Concept Life Sciences. Conflicts of interest may include, but not be limited to:

- Having a significant financial interest in our business or competitors of ours
- Have direct family or friends working for our organization or competitor

Suppliers must compete fairly and comply with competition laws and must not engage in price-fixing, solicitation, lobbying, or any other anti-competitive behaviours.

### 4. Labour, Human Rights, Equality & Diversity

Concept Life Sciences has a zero tolerance to any modern slavery or human trafficking. Suppliers must, in both their organization and supply chains, respect human rights, prohibit forced or child labour, provide fair wages, safe working conditions, non-discrimination, and respect freedom of association. Suppliers

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must ensure the conform to the UK Modern Slavery Act (2015) and any internationally recognised Human Rights standards in addition to carrying out Due Diligence on their supply chain.

We are committed to ensuring that all individuals have freedom of choice in employment, are employed only where they meet the legal working age in their country and are protected from discrimination and harassment. We expect our Suppliers to uphold the same commitment.

Concept Life Sciences are committed to ensuring we have a workforce or supply base that includes people from different backgrounds, identities, experiences, and perspectives, removing barriers that may disadvantage certain groups.

Personnel must be treated fairly, have access to opportunities creating an inclusive environment, ensuring people feel respected, valued, and able to participate fully.

## 5. Health & Safety

Suppliers must provide a safe working environment, manage risks, ensure proper training, and comply with health and safety regulations.

Concept Life Sciences expect all Suppliers to ensure they keep accurate records, provide any Risk and Method Statements (RAMS) upon request, and adhere to on-site policies. Suppliers must always protect their workers through appropriate clothing, Personal Protective Equipment (PPE) and follow appropriate safety standards for the role, and associated work.

Suppliers must ensure their people are trained appropriately for their role and have the systems and processes in place for their relevant environment. Given the nature of our business, this includes but is not limited to fire safety, chemical fires and explosions, relevant protection against chemical, biological, and physical hazards.

## 6. Environmental Responsibility

As Concept Life Sciences do, we expect Suppliers to minimize environmental impact, reduce waste and emissions, and comply with environmental laws. We prioritize working with Suppliers with EcoVadis ratings of gold or above.

We expect our Suppliers and supply chain to be actively seeking to reduce waste, emissions and provide reporting to evidence upon request. This includes responsibly sourcing materials which are hazardous, a pollutant or harmful in any way to the environment. All substances of this nature should be managed carefully, and measures should be taken to ensure they are disposed of and used in accordance with guidelines, laws and in a way which does not adversely impact our environment or local communities.

Where possible, Suppliers should effectively manage the carbon emissions associated with their operations. In some instances, we may also ask for carbon emissions related to the operations of our business which you supply or provide.

We ask that Suppliers have a plan for reduction of carbon over several years and can provide this upon request.

## 7. Supply chain Due diligence

Concept Life Sciences have a risk-based approach to due diligence; Suppliers are categorized based on our internal risk assessment. The level of risk we perceive will affect the level of due diligence required. We expect our Supplier and their supply chains to also be risk assessed and managed appropriately.

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We expect our Suppliers to cooperate with any due diligence we may need to do, in a timely and professional manner. Providing copies of any policies, procedures and evidence required to satisfy or mitigate any associated risks. We ask our suppliers to ensure all shared information is accurate, up to date and transparent.

Suppliers must take reasonable and proportionate steps to identify, assess, prevent, mitigate and, where appropriate, remediate adverse impacts within their operations and relevant supply chains.

## 8. Data Protection & Confidentiality

Suppliers must protect confidential information and comply with data protection laws such as UK GDPR.

Suppliers must not share any confidential information of Concept Life Sciences, its clients or workforce. Suppliers must ensure they notify us of any actual or suspected data breach as soon as they become aware, in line with contractual requirements, or applicable laws.

Where confidential information has been shared, must be **retained only for the purpose for which it was provided**, held securely, as you would your own organizations confidential information, and housed in accordance with any GDPR and applicable data laws and regulations. Any information must be deleted in accordance with retention requirements by law.

Should a suspected or confirmed Data protection breach occur, Suppliers must notify Concept life Sciences within 24 hours, or as soon as it becomes aware of such breach by emailing: [DPO@conceptlifesciences.com](mailto:DPO@conceptlifesciences.com).

## 9. Identity and Access Management

Suppliers must ensure that access to Concept Life Sciences systems, information and services is:

- restricted to authorised individuals with a legitimate business need;
- granted according to the principles of least privilege and need to know;
- protected by unique user accounts and appropriate authentication controls;
- regularly reviewed and promptly removed when no longer required; and
- appropriately monitored and logged.

Multi-factor authentication must be used, where technically available and proportionate to the risk, for remote access, administrative or privileged accounts, cloud services and systems containing sensitive or regulated information.

Privileged access must be restricted, separately controlled and used only for authorised administrative activities. Suppliers must not share credentials or use generic accounts unless expressly authorised and appropriately controlled.

## 10. Information Security and Business Resilience

Suppliers must maintain appropriate technical and organisational security measures to protect Concept Life Sciences, its clients, employees, information, systems and services from cyber threats, unauthorised access, loss, misuse, alteration, disclosure, and disruption.

Security measures must be proportionate to the nature of the goods or services supplied, the sensitivity of the information involved, the Supplier's level of access to Concept Life Sciences systems and the potential impact of a security incident.

These requirements are particularly applicable to Suppliers that:

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- access, manage, support, or connect to Concept Life Sciences systems or networks;
- process, store, or transmit Concept Life Sciences or client information;
- handle personal data, scientific information, intellectual property, or regulated records;
- provide software, cloud, hosting, managed IT, or other digitally dependent services; or
- provide services that are important to the continued operation of Concept Life Sciences.

## 11. Responsible Sourcing

Concept Life Sciences is committed to ethical and responsible sourcing practices and expects the same standards throughout its supply chain. Suppliers must maintain transparency regarding the origin of materials, products, and services provided to Concept Life Sciences and take reasonable steps to identify, assess, and mitigate risks within their own supply chains.

Suppliers must not knowingly source materials, products, or services that are associated with human rights violations, modern slavery, forced or child labour, human trafficking, unethical working conditions, corruption, or significant environmental harm. Suppliers are expected to implement appropriate policies, controls, and monitoring processes to ensure that their sourcing activities are conducted in a responsible, ethical, and sustainable manner.

Suppliers must comply with all applicable laws, regulations, directives, industry standards, and regulatory requirements relevant to their operations, geographic locations, and the products or services supplied to Concept Life Sciences. Where applicable, Suppliers involved in the manufacture, storage, testing, distribution, or handling of products must operate in accordance with relevant Good Manufacturing Practice (GMP) requirements and maintain appropriate quality management systems.

Suppliers are expected to establish and maintain a robust Supplier due diligence programme that includes risk-based assessment, monitoring, and periodic review of their own Suppliers and subcontractors. Appropriate records should be maintained to demonstrate compliance, and Suppliers must be able to provide evidence of supply chain due diligence, risk assessments, corrective actions, and monitoring activities upon request. Where issues are identified within the supply chain, suppliers must take timely and effective action to address them and prevent recurrence.

Concept Life Sciences encourages Suppliers to actively promote environmental stewardship, responsible resource management, and ethical business practices throughout their supply chains, supporting continuous improvement and the development of a sustainable and resilient supply network.

## 12. Quality

The scientific integrity of our data is of utmost importance to Concept life Sciences. We expect our Suppliers to ensure that materials/services/data Supplied to us meets good documentation practices, and Suppliers perform their duties to Concept Life Sciences with integrity, diligence, and high professional standards.

Concept expects Suppliers to comply with their company policy and the requirements of their QMS and continually improving the effectiveness of it, thus ensuring that quality requirements are addressed throughout the product and/or service lifecycle to Concept Life Sciences.

When applicable, Suppliers are expected to focus on process outputs to ensure that the agreed quality requirements are met. If required, Quality Agreements will be initiated by Concept Life Sciences to expand on these standards in addition to Service Level Agreements.

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### 13. Compliance & Monitoring

Suppliers and their supply chains are required to comply with this Code, maintain appropriate records, and cooperate with any audits or assessments when requested within a reasonable time frame. Concept Life Sciences reserves the right to request reports, conduct reviews, hold meetings, or undertake confidential audits of Suppliers as necessary to verify compliance.

Suppliers must ensure that all personnel are appropriately trained, competent in their assigned responsibilities, and supported through a culture of continuous learning and improvement. Effective compliance training programmes and regular competency assessments should form an integral part of personnel management processes.

### 14. Reporting Concerns

Suppliers must allow confidential reporting within their organization and not retaliate against whistleblowers. Suppliers must ensure they have a mechanism whereby whistleblowers can report concerns confidentially and without fear of reprisal.

External personnel should report concerns to their usual Concept Life Sciences contact. Where this is not appropriate, or the concern involves that contact, it should be reported through the alternative confidential reporting route provided by Concept Life Sciences by emailing [CLS.Purchasing@conceptlifesciences.com](mailto:CLS.Purchasing@conceptlifesciences.com) if your concern is Supplier related, or for anything else [CLSHR@ConceptLifeSciences.com](mailto:CLSHR@ConceptLifeSciences.com).

Any concerns surrounding data protection or misuse of personal data should be reported to: [DPO@conceptlifesciences.com](mailto:DPO@conceptlifesciences.com).

Reports will be treated sensitively and confidentially as far as reasonably possible. Concept Life Sciences will not tolerate retaliation against any person who raises a concern honestly and in good faith.

### 15. Non-Compliance

Any suspected breach of this Supplier Code of Conduct, allows Concept Life Sciences to investigate thoroughly, with your co-operation, and address as appropriate through corrective action and should be reported to Concept Life Sciences.

Concept Life Sciences follows internal Supplier complaints Standard Operating Procedure (SOP) whereby, if required Corrective and Preventative Action (CAPA) are put in place to monitor noncompliance.

If a severe breach is found to have occurred, Concept Life Sciences reserves the right to **suspend or terminate the applicable agreement in accordance with its terms**.