

ART-Biopharma's Supplier Code of Conduct Policy V2

Effective Date: 20.02.2025

Approved By: Dr David Shahbazian CEO

1. Purpose

ART-Biopharma LLC stays committed to conducting business ethically, responsibly which aligns with international practices and recognized standards.

In turn, ART-Biopharma expects the same practices and standards in accordance with international and their local regulations from all suppliers, vendors and service providers with whom we conduct business with externally.

This policy outlines our expectations when selecting and working with any external entities.

2. Applicability

This policy is to make all members of staff at ART-Biopharma aware of the expectations we have to all external entities providing services to ART-Biopharma LLC, including but not limited to:

- Clinical sample collection sites
- Site Management Organizations
- Academic and Commercial Biobanks
- Logistics services providers
- Consultants or subcontractors

3. Ethical Sourcing of Human Biospecimens

Suppliers are required to:

- Obtain and manage all human samples in compliance with informed and opt-out consent requirements or waiver of consent, which is approved within ethical approval documentation, review protocols and applicable local, regional, and international laws.
- Ensure samples are collected from voluntary donors without coercion, deception or exploitation.
- Always respect donor rights, privacy and dignity.
- Provide documentation of ethical approval, consent which covers both informed and opt-out consent and full chain of custody upon request.

- Refrain from sourcing samples from any region or entity, where human rights violations, trafficking or unethical practices may occur.

4. Legal and Regulatory Compliance

Suppliers must:

- Comply with all applicable local, national, and international laws, including HIPAA (or, where applicable, PIPEDA or equivalent privacy regulations), the General Data Protection Regulation (GDPR), the Declaration of Helsinki, as well as Good Clinical Practice (GCP) and Good Laboratory Practice (GLP) standards.
- Also comply with all relevant biobank or human tissue regulations.
- Maintain clear and accurate records of collection, processing, storage and shipment.

5. Child Labour and Human Rights

Suppliers must agree to:

- Prohibit any form of child labour, forced labour or modern-day slavery.
- Ensure to employ all staff lawfully and treat them with fairness, respect and dignity.
- Create a workplace free of discrimination, harassment and abuse.
- Ensure a safe, healthy working environment for employees, whether on-site or remote.
- Respect the right to freedom of association and collective bargaining.

6. Anti-Bribery and Corruption

Suppliers must:

- Never offer gifts, payments, commissions or other benefits to ART-Biopharma LLC employees to influence business decisions.
- Refuse all forms of bribery, kickbacks or unethical business practices.
- Immediately disclose any perceived or actual conflict of interest.

7. Environmental Responsibility

Suppliers are encouraged to:

- Minimize the use of non-recyclable or excessive packaging in sample transport.
- Use eco-efficient logistics practices where possible.
- Comply with applicable environmental protection laws in their operations.

8. Confidentiality and Data Protection

Suppliers must agree to:

- Comply with all data protection laws in accordance with the country they operate from.
- Implement adequate security measures for data.
- Proprietary information shared by ART-Biopharma LLC and in turn do not share any personal information linked to the human biospecimens which have been offered.
- Data Manifests with non-sensitive donor information should be shared pseudo-anonymized or fully anonymized.

9. Quality and Traceability

Suppliers must:

- Ensure sample quality meets agreed specifications and research needs.
- Maintain strict traceability for all samples which have been applied which includes origin, consent and handling.
- Take part in audits as stipulated in the Master Services agreement requested by ART-Biopharma LLC.

10. Monitoring and Reporting

- ART-Biopharma LLC reserves the right to request documentation or audit compliance if there is any cause for concerns regarding the operating functions.
- These will all be recorded and a thorough investigation will commence with Corrective actions and preventative measures to adhere to.

11. Consequences of Non-compliance

Failure to comply with this Supplier Code of Conduct may result in:

- Official warnings and mandatory corrective actions
- Suspension until a full investigation is completed and termination of the business relationship should corrective actions fail be met.
- In cases where required, legal reporting if serious violations are identified.

12. Acknowledgment

Through active contractual agreements and conducting business with ART-Biopharma LLC, service providers agree to comply with the requirements stipulated within this code.



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