

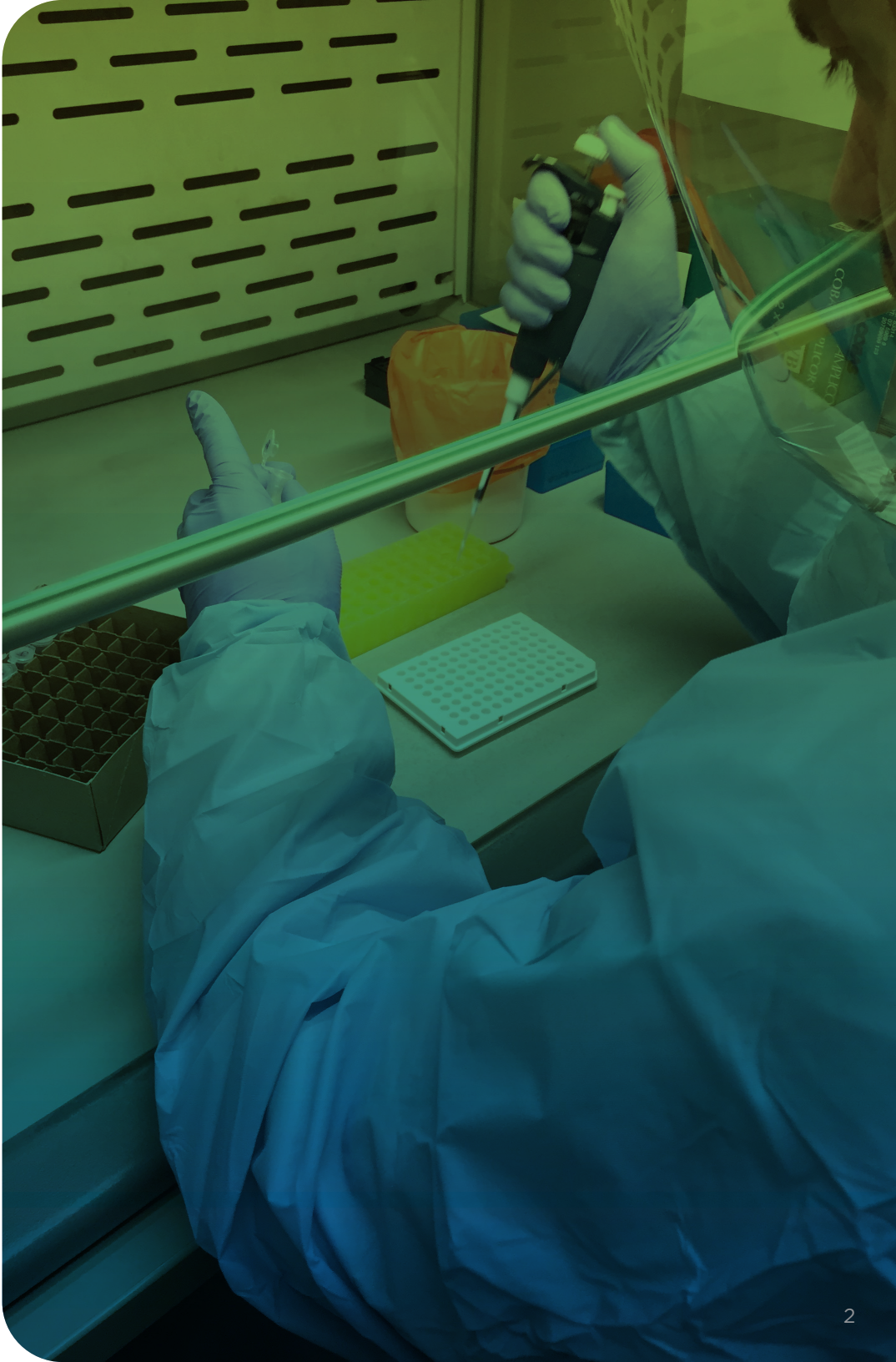
**ACM**  
GLOBAL LABORATORIES

Vendor Code of Conduct



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## Message to Vendors

As a trusted ACM Global Laboratories vendor, we appreciate your collaboration and hard work to help us execute our mission of delivering actionable clinical insights that lead to therapies and treatments that provide health, healing and hope to patients around the world. You are a valuable partner, and we depend on you to be an extension of our business.

Although there are many qualities we can attribute to being a successful partner of ACM Global Laboratories, we would like to share with you some of the key characteristics that are most important. We expect every trusted vendor to represent the below characteristics when working on behalf of ACM.

- **Integrity and Transparency:** Without a doubt, integrity is a quality I expect of every team member, leader, and trusted vendor. Just as we would not lie, steal, or cheat, neither do we tolerate those who do. When we make mistakes, we take ownership, learn, repair, and move on. I am an advocate of taking action and learning from a potential mistake rather than doing nothing for fear of an error.
- **Engagement:** I value team members who set the right example, provide the right environment, and reinforce the right behaviors that lead to an engaged team. When we keep these values in mind, together we can all help to ensure the success of ourselves, fellow team members, and the entire organization.

Additionally, included with this letter is an overview of ACM's Mission, Vision and Values that we expect all team members, leaders, and trusted vendors to exemplify and reinforce on a daily basis. Please feel free to reach out to me with any questions.

Best Regards,

A handwritten signature in black ink, appearing to read "Brian Wright", with a large, sweeping flourish at the end.

Brian Wright  
*President*

## ACM's Mission

We deliver actionable clinical insights that lead to therapies and treatments that provide health, healing and hope to patients around the world.

## ACM's Vision

Inspired by what is possible, driven by innovation and committed to excellence, ACM Global Laboratories is the partner of choice to provide scientific insights used to prevent illness, cure disease, and improve patient health.

## ACM's Core Values: E.P.I.C.

- **Execution matters:** Getting it right the first time, every time.
- **People are our priority:** Patients. Customers. Partners. Team members.
- **Integrity and transparency:** Building trust, confidence and respect with every interaction.
- **Challenge the status quo:** Innovate. Educate. Accelerate.

## Looking for more information

If you have questions about how these vendor requirements apply to your organization, we have several policies and people in our organization that can provide more information:

- **Corporate Compliance & Quality** – Our team is ready and willing to offer advice on this Code, our compliance policies, how we conform with the laws, regulations and procedures, as well as industry standards
- **Senior Leadership** - Our team is ready and willing to offer advice on how the Code pertains to your particular role at ACM
- **Legal Department** - Our team is ready and willing to offer advice on how ACM can conduct its business in compliance with the law, contracts, intellectual property and anti-trust laws
- **Human Resources** - Our team is ready and willing to help explain and answer questions related to benefits, employment and workplace issues

## Questions and Answers section

**Q** How do I report a concern?

**A** Vendors should outline any concerns and email the ACM Vendor Management group at [acmpurchasingstockroom@acmlab.com](mailto:acmpurchasingstockroom@acmlab.com)

**Q** What if I don't fully comply with one of the Codes?

**A** Please characterize the out of compliance concerns in an email to the ACM Procurement team at [acmpurchasingstockroom@acmlab.com](mailto:acmpurchasingstockroom@acmlab.com)

**Q** Where and how do I report a suspected compliance issue?

**A** Please send an email to the ACM Procurement team at [acmpurchasingstockroom@acmlab.com](mailto:acmpurchasingstockroom@acmlab.com). Clearly outline the suspicion for the team and ACM will set up time to explore with your team 1:1.

## Code of Conduct Violations

- Intentional violations of this Code of conduct can and will carry serious consequences. Those violating our Code may also face contract severance, civil, or criminal liability.
- Violations include asking other employees, third parties, contractors, vendors, or anyone else to violate this Code of Conduct, not reporting a violation of this Code of Conduct, and failing to cooperate in a Code of Conduct investigation.

- Code of Conduct violations regarding products and/or services can and more than likely will result in a Supplier Corrective Action Request (SCAR) initiated by ACM or ACM subsidiaries.



## Conflicts of Interest

- Suppliers are individually responsible for avoiding circumstances that present, or generate the appearance of, a conflict between their interests and their obligations contracted to and with ACM and ACM's obligations to their business partners.
- If a Supplier is made aware of any actual or potential conflict of interest between the Supplier's interest, duties, obligations or activities, including that of an individual employee, ACM must be notified immediately.

## Competition & Antitrust

- We want those with whom we do business to view our business practices as reliable, honest and trustworthy. Our intent is to outperform all competition fairly and with our integrity intact. We will succeed based on our performance, quality, and the value of our products and not by illegal or indecorous business practices. Competition laws, also known as 'antitrust' laws, generally prohibit agreements with competitors, suppliers or customers that could unfairly limit free and open competition.
- ACM will not unethically discriminate in prices offered to various customers; set unfair prices below cost or make false statements about competitors. ACM Global Labs will be careful when interacting with competitors. Even the appearance of liaising with competitors can damage the reputation that we hold in high standing. We will not fix prices, rig bids, allocate markets, boycott organizations, or make non-competitive agreements with our competition.
- ACM's expectation to our existing or potential vendor base is that they maintain the same level of global commitment in fair competition and antitrust laws.

## Bribery and Corruption

- **Regarding Corruption** – ACM defines corruption as the abuse of power or position for personal gain, or to obtain a business advantage. Corruption in any form is strictly prohibited. There are many forms of corruption, including fraud, bribery, kickbacks, facilitation payments, and extortion. ACM will not tolerate corruption within our any of Vendor's organization.
- **Regarding Bribery** – ACM defines Bribery as the offering, giving, receiving, asking for or promising anything of value to, or from, another person to solicit an advantage or a favorable decision or action. ACM Vendors must not, directly or indirectly, pay, offer, promise, ask for, accept, or agree to accept any bribe or kickbacks to or from any person, including government or political party officials, officials of international organizations, candidates for public office, or representatives of other businesses or persons acting on behalf of any of the foregoing, to retain or gain a commercial advantage – or even appear to do so. ACM will not tolerate bribery, from or within, any level of our Vendor's organization.

## Accounts, Books and Record

- ACM maintains the trust of our customers, business partners, and shareholders. This requires us to ensure the integrity of the records we keep and our record-keeping practices. Therefore, ACM requires clear, complete, and accurate information in order to protect our assets and inform strategic business decisions.
- All ACM Vendor's records, books, accounts, and financial statements must conform to applicable legal and regulatory requirements. ACM Vendor's records, such as financial records, emails and other information must be generated, maintained, archived and destroyed in accordance with all applicable internal policies, laws, regulations and standards.

## Fraud, Tax Evasion, and Money Laundering

ACM recognizes the basic elements of fraud as deception and dishonesty. Some examples of these prohibited activities may include: stealing from ACM, a customer or any third party, any kind of misappropriation of property, any kind of misreporting of time or costs, inflation of invoices, engaging or assisting money laundering. ACM has a standing policy of only making payments to Suppliers if there is a valid legal basis. ACM Suppliers are required to have a zero tolerance approach regarding criminal facilitation of tax evasion, and any facilitation of tax evasion.

## Trade Compliance

- Suppliers are required by ACM to comply with all applicable laws and regulations pertaining to import/export requirements, sanctions, denied parties, licensing, embargoes, anti-boycotts, and any other trade restrictions that have been approved by recognized authorities.
- Each country typically has different requirements for clearing goods and for keeping records. Therefore, suppliers must maintain and retain complete and accurate import/export records.



## Fair Treatment and Equal Opportunity

- **Regarding Discrimination and Diversity** – Suppliers must provide a workplace for their employees without discrimination. ACM does not tolerate discrimination on any basis; including race, religion, gender, sexual orientation, marital status, disability, nationality, veteran status, trade union membership, political opinion, or any other protected class, all of which are prohibited.
- **Regarding Harassment** – Workers have the right to zero harassment and discrimination of any form, in the workplace. ACM mandates that its Suppliers prohibit all types of harassment including, but not limited to, psychological, physical, verbal, visual, sexual harassment, or any other conduct of any kind that creates an offensive, intimidating, or hostile work environment.
- **Regarding Inclusion** – ACM Suppliers must commit to facilitating an environment that is inclusive of all people and their unique abilities, strengths and differences. Inclusion means that we actively create a workplace where people can be themselves regardless of their gender, gender identity, religion, age, race, color, disability, ethnicity, cultural affiliation, sexual orientation or beliefs.

- **Regarding bullying** - ACM has a zero-tolerance policy for workplace violence, gender-based or other harassment, intimidation and sexual misconduct. Likewise, Vendors are prohibited from engaging in any act, or omission, that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats, and expressions of hostility, intimidation, aggression, bullying, cyber-bullying or hazing.

## Modern slavery

ACM is committed to always act in a manner that supports our core values and ethical culture and we hold our suppliers to these same standards. One of the precautions we take is to ensure that our suppliers also behave legally and ethically. No ACM Suppliers are authorized to engage in human trafficking or slavery for any reason. This is our part to help eliminate forced labor and human trafficking in our supply chain.



## Environmental, Health, and Safety

### Environmental

- **Regarding Sustainability** – ACM seeks to create a sustainable environment and therefore we require our Suppliers to do the same. Suppliers must comply with laws regarding environmental practices and should strive to consistently improve their own environmental performance and reduce their environmental footprint.
- **Regarding Hazardous Materials Waste** – ACM Suppliers shall manage all hazardous materials capable of posing a threat to health and safety by ensuring all materials are appropriately handled and disposed of safely. Suppliers' employees must be educated and trained on how to handle hazardous materials and protection from hazards.
- **Regarding Pollution** – In order to promote a sustainable environment, all ACM Suppliers shall strive to reduce their resource consumption and use, including implementing improvement plans for waste reduction, recycling and water and energy conservation policies.

### Health and Safety:

- ACM Suppliers must take all precautions to protect employees from chemical, biological and physical hazards. Furthermore, they must focus on the prevention of on-site accidents. To help ensure safety, Suppliers must provide employees with the necessary training and protective equipment. Our Suppliers must maintain records documenting workplace injuries and health and safety trainings.
- ACM Suppliers must implement emergency response plans, including evacuation drills, fire detection equipment, and first aid supplies, to ensure the safety of workers.

### Conflict Minerals

Conflict minerals, are materials (precious metals, gems, or chemicals) where obtainment is directly linked to human rights violations; all of which are prohibited from use by ACM Suppliers. Suppliers are required to meet the conflict mineral reporting requirements as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission.

## Animal Welfare

When applicable, Suppliers involved in testing, research, or experimentation using animals will ensure all animals are treated humanely.

## Data Protection

- Suppliers shall process ACM's and our Customers' data in accordance with ACM's and our Customers' explicit instruction. Suppliers are not authorized to use any ACM owned data for their own purposes.
- ACM Suppliers must have adequate data privacy and security measures to ensure that confidential and personal information is protected and remains confidential and must only use such information as is appropriate for the delivery of goods and services to ACM. Suppliers must not disclose this information or transfer it unless given written permission from ACM. Our Suppliers must comply with all applicable data privacy laws and regulations.

## Confidentiality

Confidentiality is vital to ACM and our Customers. ACM Suppliers are required to build processes that ensure the confidentiality of all information is guaranteed. ACM Suppliers must enter into approved confidentiality agreements

prior to sharing confidential information. Sharing of such information to authorized recipients must only be on a 'need to know' basis. Any sharing of confidential information is not authorized without ACM approval.

## Intellectual Property

Suppliers will respect the intellectual property rights of ACM and our Customers', including processes, trade secrets, decision rights, logos, information, copyrights, trademarks, patents, in-house developed software, and brands and knowledge. Suppliers are required to take all precautions to protect any knowledge they create or hold on behalf of ACM.



## Whistleblowing (Anti-retaliation Policy)

- ACM prohibits retaliation against all who make a good faith report of known or suspected legal or ethical misconduct. To ACM, a “good faith report” means that you have provided all of the information you know and believe to be true.
- In addition, ACM prohibits retaliation against anyone who participates in investigations. When requested, all ACM employees are required to assist and actively participate in internal investigations.
- ACM will confront retaliatory acts with further investigations and even disciplinary actions up to and including termination. If you believe you have experienced retaliation, we ask you to report it immediately

