



**OPEN HEALTH**

# Supplier Code of Conduct

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We are working in partnership to drive positive change in healthcare communications and market access. We strive for excellence and are looking for suppliers to help us to deliver on that vision.

**Date: October 2020**

# Contents

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<b>1. Purpose and Scope .....</b>	<b>3</b>
<b>2. Ethical Standards.....</b>	<b>4</b>
<b>3. Research Standards and Ethics .....</b>	<b>5</b>
<b>4. Health and Safety, Environment and Conservation .....</b>	<b>6</b>
<b>5. Human Rights at Work .....</b>	<b>7</b>
<b>6. Compliance .....</b>	<b>8</b>

# 1. Purpose and Scope

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The **OPEN Health Group** (“OH” or “we” or “our”) strives for excellence and is committed to working in partnership with our clients to drive positive change in healthcare communications.

To achieve this and to meet social responsibilities suppliers are expected to conduct their business in an ethical manner and to act with integrity.

OH are aware of their legal and regulatory responsibilities to comply with all applicable laws, regulations, industry codes of practice relevant to our area of expertise, as well as our social responsibilities as a company and employer.

Consequently, we expect our Suppliers to adhere to the standards set out in this Code of Conduct.

## 2. Ethical Standards

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### Business Integrity

Suppliers are expected to act with integrity and in a professional manner and not engage in any unlawful or unethical activities.

### Uphold Reputation

Suppliers are expected to always uphold the OH brand and protect the reputation of our business and clients. Suppliers will ensure employees are aware of these requirements to ensure no inappropriate comments are made that may affect the OH brand or reputation.

### Anti-Bribery and Anti-Corruption

OH will not tolerate bribery or corruption in any form. Our Suppliers must not give or receive bribes or engage in other corrupt practices. OH forbids offering, authorising, committing, or providing anything of value, either directly or indirectly, to gain an improper advantage.

### Reporting Concerns

Suppliers will provide means for their employees to report concerns or potentially unlawful activities in the workplace without repercussions. Any report should be treated in a confidential manner. Suppliers will investigate such reports and take corrective action if needed.

### Data and Confidentiality

Suppliers shall take appropriate measures to secure and protect all confidential information related to its relationship with OH as well as Personal Data and use it only for the purpose authorised by OH.

### Security

Suppliers will have good security practices across their supply chains to protect its workforce and the integrity of any business data and information disclosed to it by OH and/or its clients.

### Pharmacovigilance

Suppliers are expected to adhere to all international, national and local laws and regulations and the strictest medical, scientific and ethical principles.

### Conflict of Interest

Suppliers must immediately notify OH of any conflict of interest it recognises in its provision of the goods and/or services.

# 3. Research Standards and Ethics

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OH expects all medical research projects to be carried out to the highest standards, to ensure data integrity and objectivity. Where the supplier provides goods and/or services connected to a medical research project:

- Supplier will comply with all relevant rules, ethical principles and industry standards required by the relevant regulations and, in particular, the World Medical Association Declaration of Helsinki.
- Supplier will ensure its employees and subcontractors are aware of and comply with the same regulations where necessary.
- Supplier will report any Scientific Misconduct observed in the course of providing goods and/or services to OH.

*Scientific Misconduct means the fabrication, falsification, plagiarism or deception in proposing, performing or reviewing research, or in reporting research results (for example, omitting relevant data, manipulating images, or misusing data by deliberately attempting to re-identify people from research data are all research misconduct.)*

- Supplier will report any Adverse Events to OH immediately they become aware of any adverse reaction.

*An Adverse Event is an incident that results in harm to the patient (for example, medication errors)*

# 4. Health and Safety, Environment and Conservation

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OH are focused on ensuring that relevant health and safety standards are in place for all employees and subcontractors.

## Health and Safety

Suppliers will comply with all applicable health, safety, quality and environmental laws and regulations relevant to the goods and/or services provided. All required permits, licenses and registrations will be maintained, and any reporting requirements met.

## Risk Assessments

Suppliers will perform risk assessments of the risks to all employees and visitors in providing products and services. Appropriate standards of health and safety (for example, requirements of the UK Health and Safety Act 1974) must be maintained and associated reporting requirements met.

## Waste Disposal

Suppliers will ensure any hazardous materials used in service provision are stored appropriately in accordance with relevant guidance and Control of Substances Hazardous to Health - COSHH - or equivalent guidance. Suppliers will have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges.

## Environment and Conservation

Suppliers are expected to be aware of the obligations towards sustainability and use of natural resources (e.g. water, sources of energy, raw materials) in an economical way. Negative impacts on the environment and climate will be minimized with conservation awareness and recycling and material reutilization. Suppliers will engage in the development and use of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions.

# 5. Human Rights at Work

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OH requires its Suppliers to comply with all international, national and local laws and regulations in relation to its workforce. In particular, OH expects its Suppliers to protect the human rights of their employees and subcontractors and treat them fairly, honestly and respectfully, acting with integrity and transparency at all times.

-  **Anti-Slavery**  
OH does not tolerate any form of modern slavery or human trafficking in any part of our business, including our supply chain. We expect our Suppliers to uphold the core conventions of the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and where applicable ensure statements and policies are maintained in accordance with the UK Modern Slavery Act 2018.
-  **No Forced or Child Labour**  
Suppliers shall not permit forced or child labour to be used in their business operations consistent with International Labour Organization core labour standards and the United Nations Global Compact principles.
-  **Fair Treatment**  
OH believes everyone has the right to fair treatment. We expect our Suppliers to protect all employees from harsh and inhumane treatment, sexual harassment, sexual abuse, trafficking, corporal punishment or torture, mental or physical coercion and verbal abuse in the work environment.
-  **Diversity**  
Suppliers will not discriminate in hiring, compensation, access to training, promotion, termination or retirement, consciously or unconsciously, based on irrelevant characteristics such as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Suppliers will comply with UK Equality Act 2010 and equivalent legislation in other territories including the USA, Europe and Asia.
-  **Inclusion**  
OH expects its Suppliers to implement, maintain and enforce policies of equal standards which enable diversity when it comes to their employees as well as in their decisions to select subcontractors.
-  **Working Wages**  
Suppliers will ensure their employees are fairly compensated and that, at a minimum, they comply with all applicable wage and hour laws, or industry standards. Deductions to wages shall only be made in accordance with applicable law or under collective agreement.
-  **Working Hours**  
Suppliers must provide for working hours that comply with national laws and industry standards. Total worked hours shall not exceed the maximum allowable under local legislation. Suppliers will comply with the Working Time Directive 2003/88/EC where applicable.

# 6. Compliance

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## Fair Competition

Suppliers will ensure that their business is conducted with fair competition in mind and in compliance with all applicable anti-trust laws.

## Supply Chain

Suppliers will ensure the principles set forth in these Supplier Standards apply to their supply chain.

## Adequate Processes and Training

Suppliers will provide training to allow their employees to gain an appropriate level of knowledge and understanding of the contents of these Supplier Standards and will maintain appropriate processes and systems in place to facilitate reporting and addressing any concerns or resulting issues connected with misconduct, unethical behavior, or anything contrary to the terms of these Supplier Standards.

## Legal Compliance, Privacy and Intellectual Property

OH expects its Suppliers to comply with these Supplier Standards, all applicable laws, regulations, contractual agreements, generally recognised standards and codes of conduct. Suppliers will safeguard and only make appropriate use of confidential information and ensure all intellectual property rights are protected.

## Quality

Suppliers will meet generally recognised or contractually agreed quality requirements in order to provide goods and services that consistently meet OH's needs, perform as warranted and are safe for their intended use.

## Training

Suppliers will provide training to allow their employees to gain an appropriate level of knowledge and understanding of the contents of this Supplier Code of Conduct, the applicable laws and regulations and generally recognised industry standards.

## Maintain Records

Suppliers are expected to maintain good documentary practices and maintain accurate records of their activities and performance which are clear, precise, legible and unambiguous and that clearly demonstrate compliance with all applicable standards, regulations and OH requirements. These records may be reviewed by OH on request on reasonable notice.

## Communication

Suppliers will immediately notify OH at [LegalandContracts@OpenHealthGroup.com](mailto:LegalandContracts@OpenHealthGroup.com) if it has any concerns or becomes aware of any behaviour or process at OH or within the Suppliers' business operations that does not reflect these Supplier Standards or where these Supplier Standards may not comply with all applicable laws, regulations, contractual agreements and generally recognised standards.