



OPEN HEALTH

Global Supplier Code of Conduct

v4.0 | August 2025



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Introduction

At OPEN Health, we operate as a responsible business and are committed to standards of excellence in line with our values, recognized legal, regulatory, and ethical responsibilities, and sustainable action. In 2024, we signed up to the UN Global Compact and have aligned with UN Sustainable Development Goals applicable to our business as part of our ESG IMPACT Strategy.

Aligned with our commitments, we aim to partner with suppliers who support our commitments outlined in the IMPACT Strategy, which is divided into 4 key pillars:

People



Communities



Planet



Responsible Business



Our expectation is that suppliers conduct business in accordance with the Standards and Principles of Integrity.



Standards and Principles of Integrity

We support relationships with third parties that:

- Align with frameworks that include business ethics, respect, integrity, accountability, and adopt industry best practice standards.
- Adopt sustainable and ethical business practices which cover environment, health and safety, labor, and employment practices.
- Encourage a diverse, inclusive, and equitable business culture.
- Embed excellence and integrated quality assurance standards.
- Adhere to all laws, regulations, and industry codes relevant to the supplier and services being delivered.
- Implement suitable training programs, policies, and processes.
- Maintain secure systems to protect data and implement data protection best practices.
- Uphold similar standards for their own supply chain.

Suppliers will undergo a risk-based assessment process in line with the standards required of their Supplier Tier. Larger organizations will need to demonstrate a higher level of commitment to be eligible for a Preferred Supplier status.



People



Diversity, Equity, and Inclusion

Suppliers will:

- Promote equity, fair treatment, diversity, and anti-discrimination in line with the principles of the International Labor Organization and relevant required national, local, and industry laws and regulations.
- Strive to create equal opportunities for staff, including within recruitment and promotion processes.
- Implement gender pay gap processes to support equal pay of men and women in their organization.
- Take actions against discrimination or harassment, whether conscious or unconscious.
- Implement, maintain, and enforce policies of equal standards which enable diversity and inclusion for staff and any subcontractor, in line with the requirements established for their Supplier Tier.
- Ensure workers can report concerns or breaches of legal or regulatory activities without threat of reprisal, intimidation, or harassment.



Health and Safety

Suppliers will take steps to ensure a safe working environment including:

- Conducting risk assessments of providing products and services for staff and visitors.
- Implementing appropriate processes to mitigate risks to staff, visitors, or other impacted parties' health and safety.
- Implementing systems to ensure the safe handling, movement, storage, recycling, reuse, and management of waste, air emissions, and wastewater discharges in addition to the control and storage of substances hazardous to health.
- Training of staff on compliance with all health, safety, quality, and environmental laws, regulations, and industry requirements.
- Consideration of mental health and wellbeing in health and safety frameworks.



Planet



Responsible Consumption and Production

Suppliers will take reasonable steps to ensure they operate in a manner to use natural resources and materials efficiently and sustainably through:

- Responsible consumption of natural resources through appropriate reduction and management processes (e.g., reduced water consumption, eco-friendly raw materials).
- Prolonging product lifecycles through reuse of products (e.g., reusing or donating equipment or purchasing products made from recycled materials).
- Responsible disposal of end-of-life products including the provision of suitable waste sorting facilities (e.g., for recycling or composting) and appropriate disposal processes when required (e.g., for hazardous waste).
- Improving energy efficiency and increasing renewable energy in operations.
- Maintenance of environmental permits as required by standards in their industry.
- Ensuring all purchased plant- and forest-derived materials are legally and ethically produced and distributed.
- Ensuring products do not contain restricted or banned materials, substances, and/or chemicals.



Climate Action

Suppliers should demonstrate an understanding of their environmental impact and a commitment to the protection of the natural world through:

- Understanding the risks climate change presents to their business (e.g., natural disaster due to climate instability) and implement appropriate mitigations to safeguard against such risks.
- Understanding the impact of business operations on their region and taking steps to mitigate against the risks to biodiversity and natural habitats (e.g., introducing pollinator gardens or green walls to mitigate the impacts of a built environment).
- Engaging in measurement and reporting of CO₂ emissions in line with the standards of their supplier tier (e.g., CDP or sustainability reports)
- Committing to climate action through carbon reduction initiatives in line with the standards for their supplier tier (e.g., Science-Based Targets initiative [SBTi], increasing renewable energy)
- Making available to OPEN Health any existing sustainability scorecards or other records of environmental action (e.g., CDP, EcoVadis).



Communities



Human Rights

Organizations have an impact on the communities in which they are based. As such, we expect suppliers to take reasonable steps to protect the rights and freedoms of the communities they impact, including:

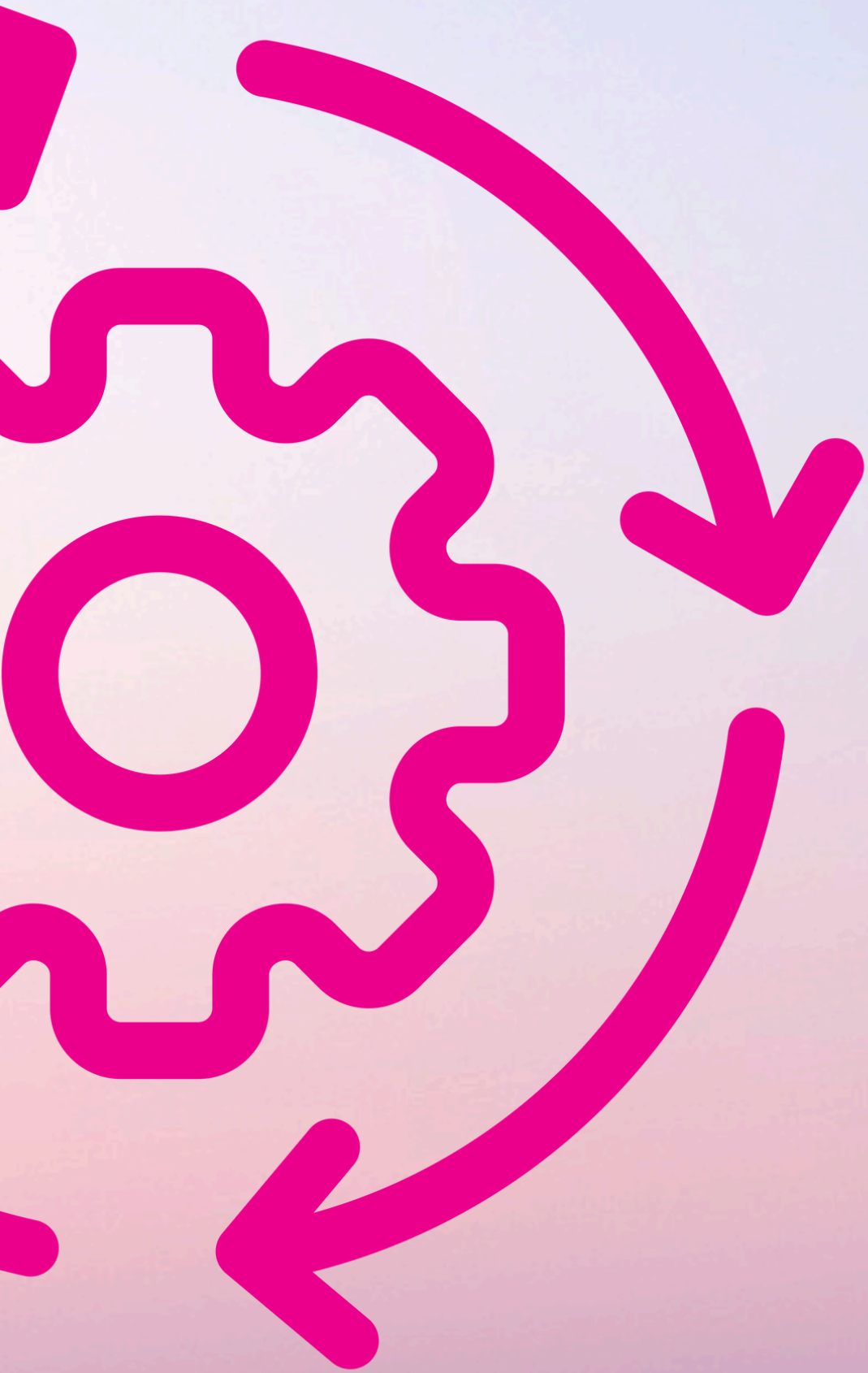
- Respecting all internationally recognized human rights in their own operations, supply base, and business relationships aligned with the responsibility that all companies have under the United Nation Guiding Principles on Business and Human Rights.
- Respecting the rights and freedoms of internal and external stakeholders, supporting and respecting the protection of internationally proclaimed human rights and making sure they are not complicit in human rights abuses.
- Not participating in any form of forced or compulsory labor, including slavery, human trafficking, sexual exploitation, mental or physical coercion, or verbal abuse in the work environment.
- Not using child labor in any form.
 - Any employment of young persons shall conform with the International Labor Organization Conventions 138 and 182 and comply with all applicable laws and regulations concerning age, hours, compensation, health, and safety.



Labor and Working Conditions

Suppliers will:

- Respect the right of all workers to freely associate, to form and join trade unions of their choosing, to seek representation, to bargain collectively, and to engage in peaceful assembly, while also respecting the right of workers to refrain from doing so.
- Ensure workers or their representatives shall be able to openly communicate with management regarding working conditions without fear of reprisal, intimidation, or harassment.
- Ensure acceptable working hours comply with relevant laws and standards, and that all staff are fairly compensated in compliance with all applicable wage laws.
- Ensure overtime work is voluntary with recognition of business needs and due care for the health and safety of workers. Overtime shall be compensated in line with applicable law as a minimum standard.
- Ensure workers are aware, in advance, of the terms and conditions of their work, preferably through a written employment contract.



**Responsible
Business**



Anti-Bribery, Corruption, and Fair Competition

Suppliers must:

- Not participate in bribery (including giving or receiving bribes, kickbacks, or inducements, engaging in corruption, extortion, or embezzlement, and/or attempting to gain an improper advantage whether to a governmental or non-governmental official or organization).
- Implement appropriate measures to prevent money laundering, fraud, or other illegal practices and monitor such measures for effectiveness.
- Have documented policies for anti-bribery and corruption, provide training to all staff on anti-bribery and corruption, and report on bribery and corruption incidents.



Gifts and Entertainment

Suppliers will not:

- Utilize gifts of value as any form of inducement, and adhere to gifts and entertainment policies within regulatory, legal, and industry standards



Anti-Trust and Fair Business Practices

- Suppliers will ensure that fair business standards are maintained and comply with relevant anti-trust laws and fair competition.
- Where suppliers are given access to commercially sensitive, patient-sensitive, or confidential information, such information will be used only for the purposes of the role or task required while maintaining safeguards.
- Suppliers will prohibit financial and professional conflicts of interest.



Quality and Data Integrity

All Suppliers will ensure:

- Record keeping and data integrity is complete, consistent, and accurate throughout the data lifecycle.
- Quality standards in their services, products, and supply chain are met.
- Maintenance of appropriate training management processes to provide staff with the necessary knowledge and understanding to comply with supplier standards.
- All relevant healthcare and research standards are met when providing research services.



Data Confidentiality and Privacy

Suppliers will:

- Safeguard and protect the confidentiality of all OPEN Health, client, and personal data and will not duplicate, modify, or disclose any OPEN Health data without appropriate written authorization.
- Ensure privacy by design for all technical and organizational systems, processes, and data-management solutions in which OPEN Health data will be stored or processed.
- Maintain data privacy practices to ensure data is subject to suitable security measures and access controls, and that data processing is only conducted in line with the purpose authorized by OPEN Health
- Report any breach of personal data to OPEN Health immediately at dataprivacy@openhealthgroup.com and collaborate with OPEN Health to investigate and implement corrective actions as required.
- Put in place appropriate data transfer agreements with any sub-processors to safeguard data in compliance with all applicable data privacy laws.
- Respond to subject access and data deletion requests promptly and confirm deletion of specified data within 7 days of request.



Data Security

Suppliers will:

- Secure and protect all such data including personal data, confidential data, and Intellectual Property and will implement appropriate data security practices to mitigate any risk of unauthorized access, disclosure, or processing.
- Implement appropriate IT security practices across their supply chain to protect its workforce and the integrity of data disclosed to it by OPEN Health.
- Specifically comply with the Privacy and Supplier Security standards available on the OPEN Health website.
- Ensure physical security measures are implemented to protect any business, client, or personal data held by the supplier.

Where suppliers are accessing OPEN Health's IT infrastructure, they must comply with industry-standard security controls for the level of access provided.



Responsible Use of Artificial Intelligence (AI)

OPEN Health recognizes the use of new technologies including Artificial Intelligence to bring benefits in the healthcare sector, provided that this includes a responsible use framework complying with laws and regulations and includes:

- Measures to avoid bias and discrimination;
- Validated accuracy and quality of outputs;
- Maintaining data confidentiality and implementing audit trails and protocols;
- Assuring privacy in combination with robust, validated security controls;
- Having in place a transparency of use and accountability framework;
- Having in place a complaints procedure.



Use of Third Parties

Suppliers will:

- Implement appropriate processes to ensure that any third parties impacting the delivery of services to or on behalf of OPEN Health are specifically authorized, suitably qualified, appropriately trained, compliant with all relevant laws and regulations, and subject to any necessary due diligence and checks.
- Maintain appropriate supplier management practices to ensure the principles set forth in this code of conduct apply to their supply chain.



Public Communications and Social Media

- All communications made about OPEN Health or on our behalf on any channel or platform must be approved in writing, in line with this code of conduct and any agreements with OPEN Health, and all laws and regulations.



Conflicts of Interest

- Suppliers are prohibited from using intellectual property or confidential or proprietary information of OPEN Health or our customers for personal gain.
- Suppliers must disclose any actual or potential conflicts of interest as soon as they arise to their designated OPEN Health contact or to the OPEN Health Governance and Compliance Team at governanceandcompliance@openhealthgroup.com.



Research Standards, Ethics, and Pharmacovigilance

Where the supplier provides goods and/or services connected to a medical research project, they will:

- Comply with all relevant rules, ethical principles, and industry standards from relevant regulations and in particular:
 - Comply with the World Medical Association Declaration of Helsinki.
 - Report scientific misconduct observed while providing goods and/or services to OPEN Health.
 - Scientific misconduct is defined as the fabrication, falsification, plagiarism, or deception in proposing, performing, or reviewing research or in reporting research results (e.g., omitting relevant data, manipulating images, or misusing data by deliberately attempting to re-identify people from research data).
- Report adverse events immediately to OPEN Health
 - An adverse event is defined as any untoward medical occurrence associated with the use of a drug in humans, whether or not it is considered drug related.



Transparency and Reporting

Suppliers will immediately report any incident with the potential to negatively impact any aspect of OPEN Health's operations or reputation to governanceandcompliance@openhealthgroup.com. Such incidents include, but are not limited to:

- Cyber-attacks resulting in data loss, destruction, or modification;
- Any significant or reportable data breach and associated actions taken;
- Any instance of fraud, bribery, corruption, money laundering, tax or unfair competition;
- Any incident which negatively impacts on local communities or minority groups;
- Any breach of environmental laws, regulations, or standards which may result in regulatory action or social objection;
- Any other environmental incident which may negatively impact on local habitats or communities;
- Any violation to internationally recognized standards such as those set out by the International Labor Organization (ILO) or the UN Global Compact.



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