



Global Supplier Code of Conduct



Foreword from the CEO

Our commitment to ethical business practices is set out clearly in our vision, which is to be the world's most respected healthcare agency by acting with **integrity in the pursuit of excellence**.

The way business is conducted is equally as important as the results achieved. Providing services in a manner that is both professional and ethical is core to our values as an organisation, in all regions and locations in which we operate.

This Policy and Code of Conduct ("Code") sets out guidance in general terms as to the behaviours and expectations for all Staff globally, establishing the principles and standards to be followed in all job-related activities. These values are supported by our commitment to providing a positive and respectful working environment for all.

Having a working knowledge of the laws and regulations that affect you in your practice and function is a core expectation. Equally important is that all Staff act with good judgment and integrity at all times.

Managers have an additional responsibility to model appropriate standards in their own behaviours and ensure this Code is followed by their teams.

Creating an environment where this Code is upheld is a key requirement for all OPEN Health leaders and managers. Day-to-day compliance with this Code is every employee's responsibility. If you become aware of possible non-compliance with this Code or have any questions about these standards, please contact your manager or the Governance & Compliance Team. All concerns raised in good faith through internal channels or through the external Ethics Helpline will be protected by OPEN Health's non-retaliation policy.

Thank you for your commitment to our values and to this Code.

Rob Barker – CEO





Introduction

OPEN Health is committed to doing things the right way, in compliance with recognised legal, regulatory and ethical responsibilities and strive for excellence in all that we do. Our expectation is that suppliers conduct business in an ethical manner in accordance with required laws and regulations, the environment, staff, and partners and to the standards and requirements of this Supplier Code of Conduct.





Standards

All Suppliers Must:

- Act with honesty, respect, integrity and accountability
- Not engage in any unlawful or unethical activities
- Act in a professional manner that protects OPEN Health's reputation
- Understand and comply with the standards in this code and applicable policies as assigned by OPEN Health and ensure their staff are aware of their responsibilities
- Have appropriate policies and processes in place to meet these standards and to deliver the services required
- Comply with all laws, regulations and industry codes relevant to the Supplier and services being delivered
- Raise concerns and report any breach of these standards, laws and regulations to: governanceandcompliance@openhealthgroup.com





Anti-Bribery, Corruption and Fair Competition

- Suppliers must not participate in bribery (give or receive bribes, kickbacks or inducements) or engage in corruption extortion or embezzlement and/or attempt to gain an improper advantage whether to a governmental or non-governmental official or organisation
- Suppliers must have documented policies for anti-bribery and corruption and all staff must be adequately trained





Gifts and Entertainment

- Supplier will adhere to any gifts and entertainment policies from OPEN Health and operate 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
- Where suppliers are given access to commercially sensitive or confidential information, such information will be used only for the purposes of the role or task required





Equality, Equity, Diversity and Inclusion

- Suppliers will promote equality and fair treatment, diversity and anti-discrimination in line with all international, national, local and industry laws and regulations
- Suppliers will strive to create equal opportunities for staff and take action against discrimination or harassment, conscious or unconscious
- Suppliers will implement, maintain and enforce policies of equal standards which enable diversity and inclusion for staff and any subcontractors used





Human Rights, Labor and Anti-Slavery

- Suppliers will support and respect the protection of internationally proclaimed human rights and make sure they are not complicit in human rights abuses
- Suppliers will uphold freedom of association and the right to collective bargaining
- Supplier will not participate in any form of forced or compulsory labour including child labour, modern slavery, sexual exploitation or mental or physical coercion and verbal abuse in the work environment
- Suppliers will ensure acceptable working hours that comply with relevant laws and standards, and that all staff are fairly compensated in compliance with all applicable wage laws





Health and Safety

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

- Risk assessments of providing products and services to staff and visitors
- Systems to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges and the control and storing of substances hazardous to health
- Training of staff on compliance with all health, safety, quality and environmental laws and regulations and industry requirements
- Consideration of mental health and wellbeing in health and safety frameworks





Environment, Social, and Governance (ESG)

Suppliers will perform in a socially and environmentally responsible manner and minimise their impact on the environment including:

- Ensuring waste and risk management and conservation practices including responsible use of natural resources (e.g. water, sources of energy, raw materials) and the re-use of products (recycling)
- Maintenance of environmental permits, policies, commitments and targets
- Engaging in measurement and reporting of CO₂ emissions using recognised ESG frameworks and commitment to carbon reduction and waste management targets (e.g. Science Based Targets [SBTi])
- Making available to OPEN Health sustainability scorecard results (e.g. EcoVadis)





Quality and Data Integrity

All Suppliers Will Ensure:

- Data integrity, and that any data they manage are complete, consistent and accurate throughout the data lifecycle
- Quality standards, records and processes are implemented
- Quality standards are met in their services, products and supply chain
- 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 not duplicate, modify or disclose any OPEN Health data without appropriate written authorisation
- Ensure privacy by design for all systems, processes and data-management solutions in which OPEN Health data will be stored or processed
- Maintain data privacy practices to ensure data are subject to suitable security measures and access controls, and that data processing is only conducted in line with the purpose authorised by OPEN Health
- Report any breach of personal data to OPEN Health immediately (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 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 and confidential data and implement appropriate data security practices to mitigate any risk of unauthorised access, disclosure or processing
- Suppliers will implement appropriate IT security practices across their supply chains to protect its workforce and the integrity of data disclosed to it by OPEN Health
- Suppliers will specifically comply with the Privacy and Supplier Security standards available on the OPEN Health website
- Suppliers will ensure physical security measures are implemented to protect any business, client or personal data held by the supplier
- Where suppliers are accessing OPEN Health IT infrastructure, they must comply with industry-standard security controls for the level of access provided





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 suitably qualified, compliant with all relevant laws and regulations and subject to any necessary due diligence and checks
- Suppliers will 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 on OPEN Health's behalf on any channel or platform need to be approved in writing in line with this code of conduct, any agreements with OPEN Health and all laws and regulations





Conflicts of Interest

- Suppliers are prohibited from using confidential or proprietary information or intellectual property 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 governance and compliance (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 considered drug related





Reporting

- Suppliers will immediately notify OPEN Health if they become aware of any behaviour or processes within their business operations or in their dealings with OPEN Health that do not reflect the standards in this code of conduct, or where these standards may not reflect applicable laws, regulations, contractual agreements and generally recognised standards
- Suppliers will not seek to prevent a concern being raised to OPEN Health by its staff and will work with OPEN Health to investigate and resolve any concerns regarding non-compliance with this code of conduct; suppliers are expected to provide a confidential independent reporting option for staff to raise concerns
- All reportable nonconformance should be reported to OPEN Health within 24 hours





Useful Contacts

Ethics Concerns To Be Raised To Governance and Compliance:
GovernanceandCompliance@OpenHealthGroup.com

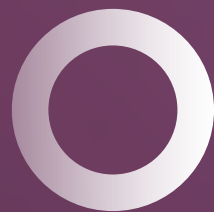
Legal Team:
LegalandContracts@OpenHealthGroup.com

For Data Breaches - Data Privacy Email:
DataPrivacy@OpenHealthGroup.com

IT Department:
ITGovernance@openhealthgroup.com

Marketing:
Marketing@openhealthgroup.com





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