

Supplier Code of Conduct





Our Purpose

The Abacus Medicine Group operates in a life-critical business where trust is non-negotiable. Our success relies on the confidence our stakeholders have in us, and every one of us has a critical role in building and maintaining trust.

We further recognize that our responsibilities may extend even beyond the letter of the law. We wish to be recognized as a company that acts in a fair and ethical manner.

This Supplier Code of Conduct defines how we want our partners to conduct business. It commits our logistic partners, suppliers and other Third Parties to strictly observe and comply with all

the fundamental principles expressed herein, in all its activities and sites worldwide. Third Parties include all stakeholders cooperating with The Abacus Medicine Group.

I. Ethical Business Practices

Suppliers should conduct their business in an ethical manner and act with professional integrity. The Abacus Medicine Group expects Third Parties to comply with all legal and regulatory requirements regarding ethics, including:

Business Integrity & Fair Competition

Corruption, extortion, embezzlement, fraud and bribery are prohibited in all their forms.

Corruption and bribery include providing something of value to a public official, a private person or a political party in order to influence the actions of a stakeholder to gain an improper advantage.

In addition, suppliers should ensure they have an adequate system in place to prevent such illegal activities. Rather, supplier's records must reflect actual and transparent payments. Furthermore, suppliers should do business in compliance with applicable

competition and antitrust laws and employ fair business practices. According to GMP and GDP regulations, third Parties must ensure they do not trade counterfeiting medicines.

Conflict of Interests

A conflict of interest exists whenever there is a competing interest that may interfere with our ability to make an objective decision and act in the best interest of The Abacus Medicine Group. Third Parties are expected to notify all affected parties if an actual or potential conflict of interest arises. Good judgment and common sense are expected to avoid such situations.

Data Security & Privacy

In today's digital era, we at The Abacus Medicine Group believe that the protection of personal data is crucial. In that respect, all of our partners should safeguard confidential information and only use it for its intended purpose.

Suppliers should maintain appropriate organizational structures and procedures to ensure the protection of personal information against accidental, unauthorized or unlawful loss, destruction, alteration, disclosure, use or access. Suppliers must also comply with laws that govern cross-border data transmissions.



II. Serving People and Workplace Wellness

Suppliers are expected to respect basic human rights and to comply at least with international human rights treaties, without prejudice to more favourable national laws.



Non-discrimination & Fair Treatment

Any forms of harassment and discrimination will not be tolerated. Every employee should be treated equally regardless of any characteristics other than their ability to do their jobs. Suppliers should not discriminate against individuals based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, marital status or any other reasons prohibited by law.

The Abacus Medicine Group expects that our partners must consider qualifications, skills and experience as the basis for the recruitment, placement, training and advancement at all levels. Moreover, suppliers should provide a workplace free of human right abuses and inhumane treatment. This includes, but is not limited to, sexual abuse, sexual harassment, corporal punishment, mental or physical coercion or intimidation of workers.

Forced Labour & Anti-slavery

All Third Parties should not engage in and not support any forms of forced labour or child labour. Local laws and regulations must be strictly followed. For instance, persons under the legal age for completion of compulsory schooling cannot be hired. Under no circumstances should a person under the age of 15 do hazardous work. Specific internal documents delivering information on the ages of the employees should be regularly updated.

Wages, Benefits & Working Hours

Every worker should be provided with an adequate wage according to applicable wage laws, including minimum wages, overtime hours and mandated benefits, including Social Security. The Abacus Medicine Group expects that Third Parties inform their employees in due time about the basis that forms their compensation. This remuneration should allow the employee and its family to meet their basic needs. Any wage deductions should be reasonable, clearly understood by the workers, and allowed by applicable law. Also, a detailed record of employees' working hours and vacation hours must be kept regularly up to date. When it comes to additional working hours, suppliers are expected to communicate with their workers whether overtime is required, and the wages coming with it. Any, such overtime must remain voluntary and in line with national and international standards.

Freedom of Association & Working Conditions

Suppliers should encourage open communication and acknowledge the employees right to either form or join a workers' organization of their own choice. Workers should be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment. Workers organizations should be allowed to act entirely independently, by disposing from reasonable access to the information, resources and means necessary to accomplish their business tasks.



III. Supporting the Environment

The Abacus Medicine Group is a young company with a young workforce. We praise an entrepreneurial mindset and the courage to do things differently. This ethos, however, is never in conflict with our dedication to quality and compliance.

Environmental Authorizations

Third Parties should comply with all the applicable local, national, regional or international environmental laws, regulations, guidelines and industry codes, within the countries where they carry out their activities. All required environmental permits, licenses, information registrations and restrictions should be obtained. Their operational and reporting requirements should be followed.

Resource Management

Third Parties should take appropriate measures to improve efficiency and reduce the consumption of natural resources. Such measures should aim at, for example, conserving energy, reducing water consumption (especially in areas of water scarcity) or measuring the operational greenhouse gas emissions on a regular basis. Furthermore, suppliers should ensure to preserve biodiversity locally in its sites and indirectly, through their purchased raw material policy. Third Parties could also avoid the use of hazardous materials where possible, and reuse or recycle appropriate materials.

Waste, Spills & Emissions

Third Parties should ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Suppliers should make sure that all the substances presenting an environmental risk are identified, labelled, stored, handled and shipped in a manner that prevents and mitigates accidental spills and releases to the environment. If required by local laws, a prevention plan and emergency plan should be in place to treat any chronic or accidental event presenting an environmental risk (air, soil, water and groundwater) inside or outside the site.



V. Management Systems

Suppliers should have management systems in place to facilitate continuous improvement and ensure compliance with the principles outlined in The Abacus Medicine Group’s Supplier Code of Conduct. Management system elements include as a minimum:

Commitment and Accountability

Adequate financial, human, and technical resources should be allocated in order to respect this Code of Conduct. Suppliers should also maintain accurate records and documentation necessary to demonstrate conformance with the report expectations. The Abacus Medicine Group or a designated external auditor should be able to check Third Parties’ records upon request. Suppliers should not hide, fail to record or make false entries.

Training and Competency

Every worker should receive appropriate training in skills, knowledge and abilities for them to fulfil what is expected from them. Documented training must be available for all employees as evidence that training was performed.

Risk Management

Suppliers should have mechanisms in place to determine and control risks in all areas addressed by this document. If required, the Supplier shall comply with local laws and financial regulations in order to assure business continuity and maintaining financial solvency.

Continuous Improvement

Third Parties are expected to continuously improve on the elements of this Code by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews.

Suppliers should notify The Abacus Medicine Group prior to making any change that may affect conformance with defined requirements.



We hereby confirm that we will follow this Supplier Code of Conduct

Date: _____

Signature: _____

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