

Supplier Code of Conduct

At Emergent, our mission is to protect and enhance life. We remain a leader in public health preparedness, continuing to deliver on **our commitments** to the U.S. government and other customers around the world to address public health threats. All of this requires an unwavering dedication to honesty, integrity, and quality, which means we hold ourselves, and our suppliers, to high standards.

Our **Supplier Code of Conduct** outlines our expectations for suppliers to conduct business legally, ethically, and responsibly – following all relevant laws, regulations, and industry standards.



A **supplier** is an individual or business entity (vendor, provider, distributor, contractor, sellers, or dealers) that provides goods, services, or resources to Emergent.

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WE ARE COMMITTED TO...

Quality and patient safety

We are dedicated to delivering high-quality, safe, and effective products. The people who use our products trust us to do that. And they deserve no less from each of us. At Emergent, we choose to be a culture built on quality to ensure trust and confidence in our products. In short, we “Lead with Integrity” by doing the right thing, the right way every time.

We need help from our suppliers to deliver high-quality, safe, and effective products. We expect our suppliers to:

- Deliver **safe and effective, high-quality materials** and products that meet or exceed customer expectations
- Comply with **all applicable regulatory requirements**
- Continuously improve the effectiveness of their **quality management system**
- Ensure the **integrity of their data**



Reporting Adverse Events

The welfare of people who use our products always comes first. We expect your employees to report any adverse event, complaint, or side effect related to Emergent products within 24 hours by emailing medicalinformation@EBSI.com or call (517) 327-1500. This allows us to investigate potential issues and take steps to correct them, if needed.

WE ARE COMMITTED TO...

Conducting business with integrity

Emergent expects suppliers commit to conducting their business in an ethical manner and acting with integrity. This section outlines expectations for suppliers in each of these areas:

- [Anti-Bribery and Corruption](#)
- [Conflicts of Interest](#)
- [Privacy](#)
- [Gifts, entertainment, and meals](#)
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Anti-Bribery and Corruption

- Do not offer or accept anything of value to obtain an unfair business advantage.
- Never engage in any kind of bribery or kickbacks, including promising, offering, providing, or authorizing anything of value to a government official or political entity to gain an unfair business advantage.
- Fully comply with all applicable foreign and domestic anti-corruption laws.

Conflicts of interest

- Avoid activities that could create the appearance of impropriety or appear to compromise someone's judgment.
- Take reasonable care not to engage in any activities that would create an actual or potential conflict of interest regarding their duties, interests, and obligations to Emergent.
- Notify Emergent if any conflicts of interest arise.

CONDUCTING BUSINESS WITH INTEGRITY

Privacy

- Comply with applicable privacy and data protection laws, as well as maintain policies and procedures designed to protect the data of Emergent employees and customers.
- Ensure the protection, security, and lawful use of confidential information and employee and personal data.
- If collecting consumer data on behalf of Emergent, complete a Data Privacy Impact Assessment prior to collection.
- Immediately report any incident where the protection and security of data of Emergent employees or customers has been compromised. Send an email to: privacy@ebsi.com

Gifts, entertainment, and meals

- All interactions involving gifts, entertainment, and meals must be conducted with integrity, honesty, transparency, and in accordance with applicable laws.
- Avoid any activities that would appear to compromise someone's judgment or could create the appearance of impropriety.
- Do not offer or accept anything of value from any business suppliers to obtain an unfair business advantage.

Interaction with HCPs and customers

- When interacting with health care professionals (HCPs) or customers on behalf of Emergent, conduct all interactions ethically and in compliance with applicable laws, regulations, guidelines, and industry codes.
- HCP/HCO payments and transfers of value must be captured to ensure full compliance with applicable Spend Transparency laws.

Marketing and promotional practices

- All marketing and promotional materials and activities must comply with all applicable laws, regulations, guidelines, and industry codes.
- Any use of Emergent's name or logo must be approved by Emergent's Communications team.
 - This includes, for example, using Emergent's name or brand names to promote services.



Scientific and research integrity

- Conduct research and development with ethical integrity and consistent with applicable laws, regulations, and practice guidelines.
 - This includes, but is not limited to Good Manufacturing Practices, Good Laboratory Practices, and Good Clinical Practices.

Speaking up and Anti-retaliation

- Suppliers and their employees should report concerns or potential illegal activities in the workplace without fear of retaliation.
- Create and maintain an anonymous system for employees to report complaints and protect the identity of anyone who chooses to do so.
 - While most reports will be made to our suppliers' reporting system, our suppliers and their employees also have access to our [Emergent Speak Up Hotline](#) to report issues relating to Emergent products, employees, or this Supplier Code of Conduct.
- Prohibit retaliation against anyone who has, in good faith, reported concerns or potential illegal activities.
- If our suppliers or their employees raise concerns regarding waste, fraud, or abuse on a federal contract to appropriate governmental authorities, those individuals are considered whistleblowers and have special legal protections from being discharged, demoted, or otherwise discriminated against in reprisal for raising concerns.



United States Government contracting

As a federal funding recipient, Emergent must follow provisions outlined in our awards. If Emergent uses a federal grant or contract as the source of funding for any services, Emergent will notify our suppliers. This may require, as a condition of such grant or contract, that our suppliers comply with additional contract provisions, including certain clauses of the Federal Acquisitions Regulation (FAR), as well as agency supplements, policy directives, or other terms and conditions (Flow Down Provisions). Where applicable, we also expect our suppliers to comply with the Subcontracts for Commercial Products and Commercial Services (FAR 52.244-6).

WE ARE COMMITTED TO...

Human rights and socially responsible business practices

We expect our suppliers to commit to respecting human rights and honoring the highest standard when applicable laws and regulations differ.

	Our suppliers must:
Child Labor	Not use child labor and must comply with all applicable child labor laws. They should not employ or cause to be employed any individuals under the legal local minimum age to work.
Freedom of Association and Union Association	Recognize, respect, and protect employees' lawful rights to freely associate and collectively bargain in accordance with applicable laws and regulations and without fear of retaliation.
Diversity and Inclusion	Remain committed to ensuring an inclusive and diverse workforce and supply chain, making efforts to procure from small and diverse-owned businesses. This aligns with breakthrough thinking, one of Emergent's values, requiring a diverse workforce and diverse suppliers.
Immigration	Comply with applicable immigration laws and regulations in any jurisdiction where they and Emergent operate and only employ workers with a legal right to work in the relevant location.
Nondiscrimination	Not engage in or tolerate any discriminatory conduct against any person on any basis, including race, religion, gender, sexual orientation, disability, nationality, veteran status, union membership, political opinion, or any other class protected by country, federal, state, or local laws or regulations.
No Harassment	Prohibit all types of harassment including, but not limited to physical, verbal, psychological, and sexual harassment, giving all workers a right to a workplace free of harassment and abuse.
No Forced Labor and Anti-Human Trafficking	Ensure that all work is on a voluntary basis and not use or tolerate the use of any illegal form of forced labor, including trafficked, bonded, slave, indentured, or prison labor.
Terms of Employment	Provide employees an environment respectful of human dignity and fundamental rights.
Working hours	Comply with all applicable laws and regulations regarding working hours, break periods, and overtime hours in any jurisdiction where the supplier and Emergent operates.
Wages, benefits, and housing	<p>Pay employees in accordance with applicable wage laws, including minimum wages, overtime hours, and mandated benefits in any jurisdiction where the supplier operates. Employees must not be expected to work additional hours to earn minimum wage for a day's work.</p> <p>When applicable, our suppliers providing housing facilities to employees must follow legal requirements for living space in sleeping quarters, clean toilet facilities, potable water, and sanitary food preparation and eating facilities. Living spaces must be distinct from the factory/production area and separated by gender.</p>

Report any concerns to: [Emergent's Speak Up Hotline](#).

WE ARE COMMITTED TO...

Conducting business lawfully

We require our suppliers to fully comply with all laws, rules, and regulations applicable to their country of operation.

	Our suppliers must:
Compete fairly	Conduct their business in full compliance with all applicable fair competition and antitrust laws and regulations in the jurisdictions in which it operates.
Disclosure of information	Accurately record and disclose information regarding its business activities, without falsification or misrepresentation, to all appropriate parties and as required by law.
Insider trading	Not purchase, sell, or trade Emergent securities if they are in possession or aware of non-public material information about Emergent. Non-public information is information that is not available to the general public, and which could influence an investor to buy, sell, or hold securities.
Intellectual property	Respect Emergent's intellectual property (IP) rights, including processes, information, technology, and customer information. Suppliers are required to take all reasonable efforts and necessary precautions to safeguard their knowledge of Emergent IP and protect our company's IP rights.
Keeping accurate business records	Maintain up-to-date business and financial books, records and statements to demonstrate compliance with applicable laws, regulations, and accounting principles.
Trade and sanctions	Comply with all applicable import and export controls, sanctions and other trade compliance laws of the country(ies) where transactions occur. We also expect transparency when there is a trade control violation. If you suspect a violation, you can reach out to the Emergent trade control officer or call the <u>Emergent Speak Up hotline</u> .



WE ARE COMMITTED TO...

Environment, health, and safety

Our suppliers must comply with all applicable safety and health laws and regulations in the countries in which they operate. Additionally, they are expected to provide employees with a healthy and safe workplace, including access to clean, safe, and reasonable working conditions. This commitment ensures a safe working environment for all employees.

Environment

We recognize our responsibility to the environment and seek to operate sustainably.

	Our suppliers must:
Sustainability	Apply a continuous improvement approach to enhance their environmental performance and reduce their environmental footprint. Our suppliers must follow all applicable laws and regulations regarding environmental practices.
Hazardous waste	Create and maintain systems to ensure the safe handling, movement, storage, disposal, and management of hazardous materials. And train employees on how to handle hazardous material.
Waste and emissions to land, air, and water	<p>Strive to reduce consumption of resources, including raw materials, energy, and water. Have plans for waste reduction, recycling, and energy conservation and seek ways to use cleaner sources of energy.</p> <p>Monitor, treat, control, manage, and properly dispose of wastewater and solid waste, as well as comply with all applicable waste management laws and regulations.</p> <p>Our suppliers must do their best to identify, manage, reduce, and properly dispose of air emissions that pose a hazard to the environment. Conduct routine monitoring of the performance of its air emission control systems.</p>
Conflict minerals	Not use conflict minerals whose obtainment is linked to human rights violations, as well as cooperate with Emergent in efforts to comply with any applicable reporting requirements.



Health and safety

	Our suppliers must:
No substance abuse	Create and maintain a workplace free from the illegal use, possession, sale, or distribution of controlled substances.
Occupational safety and incident management	<p>Have policies and procedures in place that protect workers from exposure to chemical, biological, and physical hazards, in addition to on-site accidents. And are expected to identify, evaluate, and manage these occupational health and safety hazards.</p> <p>Must create and maintain procedures to prevent, manage, track, and report employee safety incidents. And implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate employees' return to work.</p>
Emergency prevention	Develop and implement emergency plans and response procedures, including fire alarms, fire drills, exit facilitates, fire detection and suppression equipment, and recovery plans to minimize harm to life and property.
Business continuity	Maintain appropriate business continuity plans for operations supporting the Emergent business with the goal of promptly recovering and restoring interrupted critical functions to minimize disruption to the Emergent business.



WE ARE COMMITTED TO...

Continuous improvement

At Emergent, we expect that our suppliers do the **right thing, the right way, every time**. This includes allocating appropriate resources to maintaining guidelines that provide employees with clear expectations for how to conduct business with integrity. This includes but is not limited to:

- **Policies** that describe business integrity principles and procedures that support employees in implementation.
- **Annual training** to ensure compliance with and knowledge of applicable laws and regulations.
- **Risk assessments** that identify risks in the areas addressed in this Code, assess the significance of each risk, and implement appropriate procedures and controls to minimize the identified risks.
- A mechanism for employees to **report concerns or violations without fear of retaliation**.
- **Third party risk management**, ensuring that the suppliers are compliant with the provisions of this Code and the law.

Noncompliance with our Supplier Code of Conduct

Part of conducting business with Emergent includes compliance with this Supplier Code of Conduct.

If it is determined a supplier does not adhere to the Code, they must correct their actions to ensure compliance with the requirements outlined in this document.



Raising Concerns: Emergent Speak Up line

Employees and suppliers can use the Emergent Speak Up line to report concerns or to ask questions.

To report any concerns, please visit:
[Speakup.emergentbiosolutions.com](https://speakup.emergentbiosolutions.com)

Thank you in advance for your commitment to Emergent's mission.

Anonymity can be provided if requested and to the extent possible, where local law permits. Suppliers who choose to identify themselves are assured that Emergent will not retaliate against individuals who make reports in good faith. Emergent will review the reported concerns and manage it according to our Investigations Policy and Process.