



## **BIOMEDICA CODE OF CONDUCT**

**Effective date June 12, 2023**

### **1. Purpose**

The Code of Conduct is our guide to doing the right thing and to help us to observe high standards of integrity and honesty, acting with care, diligence, and fairness in all business activities.

### **2. Scope**

Every person conducting business for Biomedica worldwide must follow and employ reasonable steps in preventing violations of this Code of Conduct, together with all applicable laws and company policies. This includes all staff and levels of management as well as consultants, external workers, secondees, and temporary workers. This Code of Conduct also applies to all Biomedica locations, affiliates, and subsidiaries. In some countries, due to local laws or business requirements, the policies discussed here may be supplemented by additional policies or standards to address local requirements.

One of your responsibilities is to follow the law and Biomedica policies as you conduct business on behalf of Biomedica. While this Code of Conduct has been written to familiarize you with many of the policies that apply at Biomedica it does not supersede them or act as a substitute for reading each policy, SOP and process that applies to your specific job, no written policy or code on its own can guarantee compliance with the law or ethical decision-making. Each of us must do our part.

### **3. Company ethical commitment**

#### **Access to medicines**

Many people still lack access to medicines and healthcare. As the size and complexity of the world's healthcare challenges continue to grow, our commitment is to extend access to the medicines for underserved patient populations.

We address the unmet needs of global patients by deploying our distribution infrastructure and navigating complex regulatory environments to supply unlicensed medicines via named patient programs for unlicensed medicines and represent specialty medicine biopharma companies in key emerging markets through licensing and partnership agreements for licensed medicines.

#### **Anti-corruption**

We prohibit bribery and corruption. None of us or anyone acting on our behalf may offer or pay a bribe, kickback, or other improper payment. We are also not allowed to provide anything of value that is intended to win business, improperly influence a decision, or gain an unfair business advantage – or even appear to do so. We are committed to comply with the letter and spirit of the United States Foreign Corrupt Practices Act (“FCPA”), UK Bribery Act and their local equivalents in all the countries where Biomedica operates.

### **Anti-trust, Unfair Competition**

Competition drives innovation and leads to greater choice of higher quality products at competitive prices, benefiting patients and society. We conduct our business to serve the interests of Biomedica and our customers in manner that doesn't unfairly restrict trade and without anti-competitive understandings or agreements with competitors.

### **Business continuity and crisis management**

As a distribution company we are committed to ensure uninterrupted supply of key products and services to patients. We will take all reasonable precautions to protect patients, associates, assets, and the business from a disruptive incident.

### **Conflicts of interest**

Conflicts of interest arise when we place personal, social, financial, or political interests before Company's interest. Members of our Companies' management teams and employees are responsible for avoiding situations that present – or create the appearance of – a conflict between their interests and those of Biomedica. Whether on the job or in our private life, nothing should conflict with our responsibilities to Biomedica.

We will disclose and manage potential, perceived, and existing conflicts of interest.

### **Customs and trade compliance**

We comply with customs regulations, export controls and trade sanction laws. It allows us to deliver our medicines in a timely manner to patients who need them. We ensure that we do not engage with persons or companies that have been placed by governments on sanctioned party lists. We comply with regulations and laws that govern the distribution and use of our products in markets in which we operate.

### **Data privacy**

Biomedica is committed to collecting and keeping only personal information that is legitimately needed to carry out our business, and to implementing measures designed to protect that information. We collect, use, and retain personal information only to the extent we need it for legitimate business, human resources, or scientific purposes, or as otherwise required by applicable laws.

### **Drug safety**

Medicines and treatments can have potentially undesirable effects. Reporting those adverse events is critical to take appropriate actions to safeguard patient safety. To follow strict safety monitoring and evaluation processes at every stage of the product lifecycle we report adverse events within 24 hours of discovery to our pharmacovigilance employees and quality complaints

to quality assurance, and then transparently communicate the risks of the medicines to regulatory authorities and our partners if applicable.

### **Fair employment practices, diversity, and inclusion**

We create a safe place to work, where all our associates have an equal opportunity to succeed. We do not tolerate discrimination, harassment, retaliation, bullying or incivility. We value the contributions of all our associates and encourage them to express themselves and their opinions freely in a professional way. We educate our people on inclusivity and provide all associates with equal opportunities to contribute to our company and advance their careers.

### **Financial integrity**

We maintain accurate and complete financial records, and make full, fair, accurate, timely, and understandable disclosure in reports and documents that we file with government regulatory bodies or otherwise make publicly available.

### **Interactions with Healthcare Professionals and Healthcare Organizations**

Biomedica interacts with healthcare professionals and healthcare organizations in a variety of contexts. Biomedica committed to comply with all applicable laws and regulations and industry standards and to adhere to the highest standards in its marketing, promotional and educational activities. In general, any payment or benefit provided to a healthcare professional, or healthcare organizations must comply with the standards that are defined in Biomedica Policy on Interactions with Members of the Health Care Community.

### **Interactions with Business Partners and Third-party management**

We select the parties best suited for our business and society based on objective criteria, evidencing their competence, integrity, and other relevant merits. We conduct business with individuals and organizations who share our values and commitment to high ethical standards. We strive to ensure that throughout our relationship, the third party continues to uphold the same standards. We follow our comprehensive due diligence program and procurement process to choose the best partners in the markets where we operate.

## **4. Disciplinary Action**

Failure to comply with the Code, Biomedica policies, or applicable law will subject staff to disciplinary action up to and including termination of employment, to the extent permitted by local laws. Disciplinary action may also be taken when managers ignore misconduct or fail to correct it. Managers must also ensure their teams are educated on the standards of business conduct, promote compliance, prevent violations, supervise, and guide subordinates regarding standards, and create a culture that encourages staff to voice their concerns. In addition, Biomedica may terminate the services or work engagement of non-employees who fail to comply with the Code, our policies, and applicable law.

## **5. Reporting obligations**

Employees who believe their conduct or the conduct of the fellow employee, partner or third party may have violated desired behaviours or any other Code of Conduct provisions, have an obligation to report it.

Employees should report concerns about any potential misconduct or unethical behaviour to the following email address: [compliance@biomedica.com](mailto:compliance@biomedica.com).

Third party Representatives are expected and encouraged to seek guidance, raise concerns and to contact Biomedica to ask questions and/or report concerns to the following e-mail address [compliance@biomedica.com](mailto:compliance@biomedica.com) about any potential misconduct or unethical behavior by Third Party Representatives, Biomedica or their affiliated parties.

Biomedica is committed to non-retaliation and will maintain appropriate confidentiality and anonymity with respect to all disclosures.