

# Supplier Code of Conduct.

A GUIDE TO WORKING WITH US



iNIZIO

## Understanding and abiding by our Supplier Code of Conduct.

At Inizio, our success and relationships are built on exceeding expectations. Those who supply Inizio play an important role in this. We believe in the power of collaboration – in shared goals – and are committed to relationships with those who share this vision.

Inizio provides high-quality, sustainable services to the health and life science sectors. We do so in an ethical manner, in compliance with all applicable laws and regulations, and in accordance with the requirements detailed below.

As such we expect the same from our suppliers, vendors, contractors, consultants, and other third parties who work with us or act on our behalf (collectively, “suppliers”).

As a supplier, you’re expected to understand and abide by our Supplier Code of Conduct, doing so in a manner consistent with the laws, values, and cultural expectations of the various jurisdictions in which you conduct business.

We also encourage you to develop your own policies and training that address the ethical business and workplace standards discussed below.





# Ethical Business Practices.





## Applicable laws and regulations.

You must comply with all applicable laws and regulations of the jurisdictions in which you operate or conduct business.



## Anti-bribery, anti-corruption.

Inizio is committed to conducting our business in an open, honest, and ethical manner.

You must not offer, receive, or facilitate bribes, kickbacks, other improper payments, or corruption in any form. You must also abide by all applicable anti-bribery and anti-corruption laws and regulations of the jurisdictions in which you operate or conduct business.

You must not offer or accept any payment or other unlawful incentive to attain or retain business.



## Books, records and disclosures.

You must accurately keep records and disclose information pertaining to your financial performance and position, and business activities. We expect you to have sufficient internal controls as necessary to do so.

Financial books and records must be maintained in accordance with applicable laws, regulations, and generally accepted accounting principles.







## Conflicts of Interest.

You must not have competing interests that could interfere with your ability to deliver your products or services to Inizio, or make objective decisions pertaining to Inizio. Competing interests could include, but aren't limited to, one of your employees being a family relation or having a commercial or financial relationship with an Inizio employee.

Any such interests, or interests that could be perceived as competing, must be disclosed in writing, before doing business with us.



## Fair competition and business practices.

You must conduct business in compliance with all applicable antitrust and competition laws and regulations. You must also uphold other fair business standards including those applicable to sales and advertising practices.



## Gifts and entertainment.

You must respect our policies regarding gifts, entertainment, and conflicts of interest when interacting with our employees. Inizio employees must deal with suppliers and all others who conduct business with us in a completely fair and objective manner without favor, preference, or the appearance of either due to personal relationships or personal financial considerations.







## Information security.

You must comply with laws, regulations, and contractual requirements pertaining to the collection, processing, transfer, storage, protection, and use of Inizio-provided confidential or personal information. You must employ adequate physical and technical security measures, recovery capabilities, and access controls to safely protect such information. You must notify us immediately if any unauthorized or unlawful processing, access, loss, damage, or destruction of such information occurs.

Suppliers shall not use or disclose Inizio confidential information other than with the express prior written consent of, and for the benefit of, Inizio.



## International trade controls.

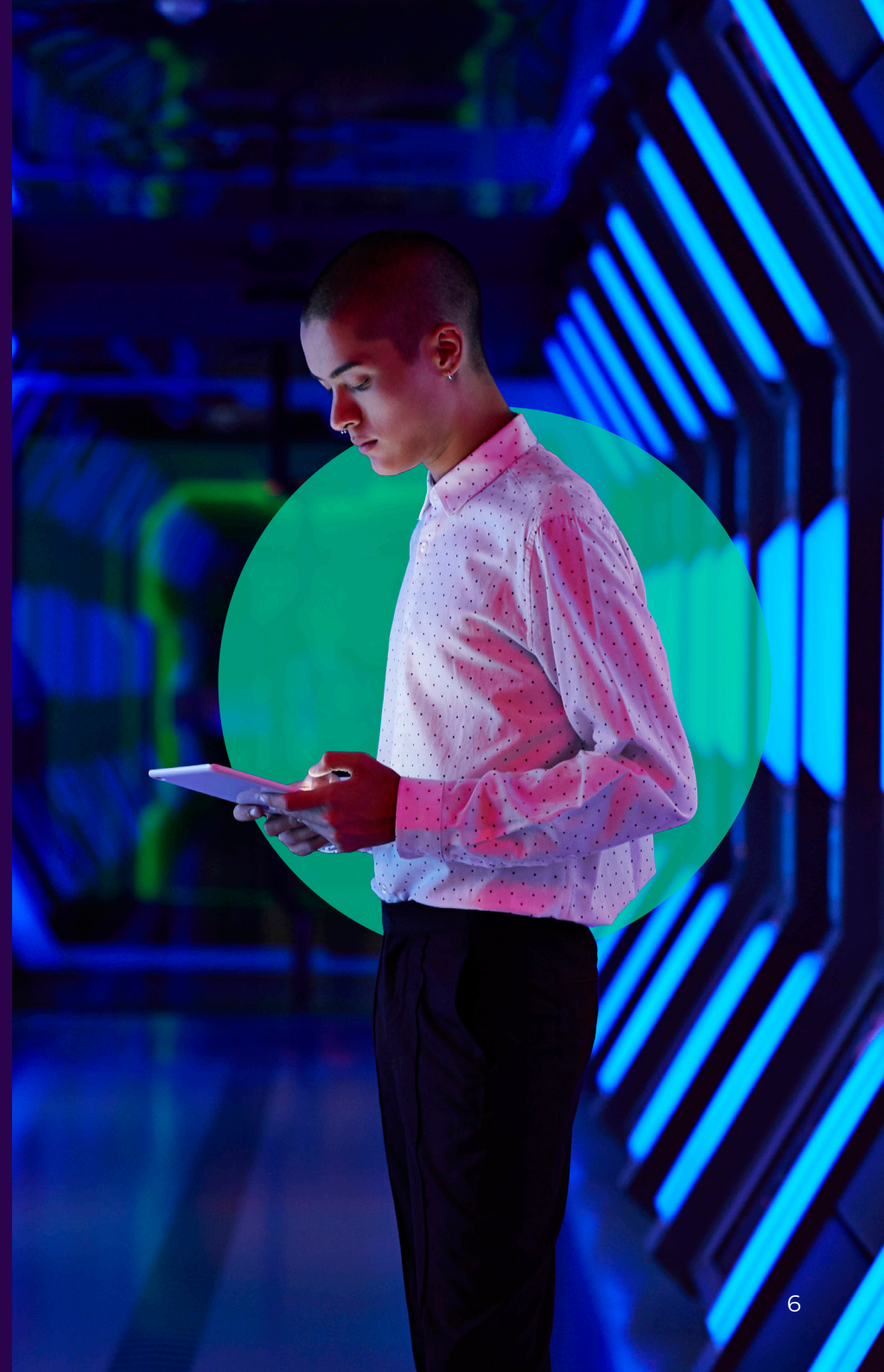
You must comply with all applicable import and export controls, sanctions and other trade compliance laws and regulations. You must not provide services from a sanctioned country or involve entities from or located within a sanctioned country.

While providing services to Inizio, you must not be sanctioned, owned, or controlled by a sanctioned individual or entity, or conduct business with any sanctioned individual or entity.



## Securities laws and insider trading.

You must comply with all applicable securities laws and regulations including, but not limited to, rules prohibiting the purchase, sale, or transfer of stock or other securities of any company based on material non-public information. Information is regarded as material if there's a reasonable likelihood that it would be considered important to an investor in making an investment decision. Non-public information is information that hasn't been previously disclosed to the general public and is otherwise not available.





# Standards for the Workplace.





## Employee and labor protections.

We expect you to comply with all legal and regulatory requirements pertaining to the fair and equitable treatment of employees and to treat them with dignity and respect.

You must not use forced, bonded, or indentured labor, involuntary prison labor or trafficked labor.

You must not use child labor. The employment of workers below the age of 18 should only occur in non-hazardous work and when young workers are above a country's legal age for employment, or the age established for completing compulsory education. Please keep employee files maintained with adequate data to verify ages of employees.



## Environmental sustainability.

Suppliers must operate in an environmentally responsible and efficient manner. You are expected to have an understanding of your environmental impact and to demonstrate a commitment to reducing your greenhouse gas emissions. Suppliers are also encouraged to conserve natural resources and to avoid the use of hazardous materials where possible. Suppliers must obtain, maintain and keep current all required environmental permits, licenses and registrations and follow all required reporting and operational requirements of such permits.



## Fair treatment and non-discrimination.

You should provide a workplace free of harassment, discrimination, and harsh or inhumane treatment. Harassment, discrimination, or inhumane treatment for reasons such as race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status shall not be condoned or tolerated.

We expect you to share our commitment to equal opportunity and diversity in employment.







## Freedom of association.

We expect you to respect the rights of workers, as set forth in local laws, to associate freely with one another. Your employees should be able to communicate openly with your management team regarding working conditions without threat of reprisal, intimidation, or harassment.



## Health and safety.

You must protect employees in the workplace, and in any company living quarters, by providing a safe and healthy environment. We expect you to comply with all legal and regulatory requirements regarding occupational health and safety.



## Wages, benefits and working hours.

You should pay employees according to applicable wage laws, including minimum wages, overtime hours, and mandated benefits as per the custom of the country of employment. You must tell employees the basis on which they're being compensated in a timely manner. You're also expected to tell employees whether overtime is required and the wages to be paid for such work. Please keep accurate records regarding employee working hours and vacation hours. We encourage open communication and direct engagement with employees to resolve workplace and compensation issues.



## Waste management.

Suppliers must have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste and wastewater discharges. Any waste with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.





# Systems and Reporting.





## Management systems.

You must have management systems in place to facilitate continual improvement and ensure compliance with applicable laws and the principles outlined here. We encourage you to conform to ISO 9001 or equivalent standards at all times.

Elements of effective management systems include:

- Knowing and managing change associated with risks, laws, regulations, and client requirements.
- Systems and processes supported by policies and procedures, document control, and training.
- Issue management including the prevention of recurrence through investigation, correcting, and learning.
- Performance enhancement through monitoring, audit, and corrective action identification and resolution.



## Internal reporting.

You should have your own internal procedure for the reporting of ethics violations or suspected breaches in laws, regulations, or company policies. This procedure should be accessible to all those working for and with you and be regularly reinforced through training and communications. You must expressly prohibit retaliation that could arise from such reports.



## Own supply chain.

We encourage you to manage your own suppliers in a manner consistent with this Supplier Code of Conduct. Where you use third parties to deliver products and services to Inizio, you should communicate the principles established in this Code to such third parties, periodically evaluating their adherence to them and other applicable laws and regulations.





## Reporting to Inizio.

If you have any concerns about suspected compliance or ethics violations, please contact [compliance@inizio.health](mailto:compliance@inizio.health) or use our confidential Speak Up reporting channels available at [inizio.ethicspoint.com](https://inizio.ethicspoint.com).