



Code Of Conduct

Purpose and Scope

Novotech is committed to the highest professional and ethical standards of behaviour in all our business activities and committed to supporting a culture of honesty, integrity and compliance with the laws and regulations.

This Code sets out the highest standards of conduct expected by Novotech from its employees, directors, and officers.

This Code will provide general guidance around ethical and legal responsibilities and is not intended to address every situation that we may encounter at Novotech.

Applicable Group

This Code applies to all Employees, Officers, Directors (all referred to as Employees in this policy).

General Information

None.

Policy

1. Personal behaviour and conduct

Novotech employees will conduct themselves in a manner that is consistent with:

- A culture of open communication, teamwork, sharing knowledge and experience.
- A productive and harmonious working environment where we respect the views of others.

2. Working together and with others

When working together or with others, Novotech employees will:

- Behave honestly and with integrity in our dealings;
- Treat others fairly, with courtesy and respect;
- Respect our multicultural experience and diversity as strengths of our organisation;
- Maintain the strictest confidentiality about the business, our clients, vendors, and colleagues in compliance with the law, professional standards, and our contractual obligations.

3. Ethical Questions

Our integrity and judgement are essential in ensuring that we conduct our business in a lawful and ethical way.

Consider the following questions before taking a step:

- Do I have all the necessary information?
- Are my actions lawful?
- Are my actions consistent with the Company's values, principles, policies, and procedures?
- What are the consequences of my actions for me, the Company, my colleagues, Clients, and others?
- Are my actions transparent?

4. Guidance On Code

If you need assistance to understand the principles as set out in this Code or uncertain how to apply them, you may refer to the following internal team members:

- Managers and senior leadership members.
- Human Resources Department.
- Legal, Quality, and Compliance Department.

5. Reporting Concerns

If you become aware of any violation of this Code, you should make a report to the Authorised Recipient in accordance with Whistleblower Policy (POL-COM-003).

Novotech prohibits retaliation against any individual who reports or participates in an investigation of a suspected violation of our Code, Company's policies. If you believe you are being retaliated against, please report through our whistleblowing channel.

6. Conflict Of Interest

Novotech insists on honesty, integrity, and fairness in all aspects of its business and expects the same in its relationships with all those with whom it does business. Therefore, Employees and Novotech representatives must avoid conflicts of interest between their private activities and their part in the conduct of Novotech business.

A "personal conflict of interest" occurs when an individual's private interest improperly interferes with the interests of Novotech or any of its investors or affiliates. Personal conflicts of interest are prohibited as a matter of policy unless they have been approved in writing by the HR or Compliance Department. In particular, employees must never use or attempt to use their position at Novotech to obtain any improper personal benefit for themselves, for their family members, or for any other person, including loans or guarantees of obligations, from any person or entity.

7. Modern Slavery And Fair Labour Practices

Novotech is committed to respecting and promoting fair labour practices as a corporate organization, including a zero-tolerance approach towards all forms of modern slavery practices in our operations and supply chain.

Novotech also promotes gender equality throughout our business and business relationship with our vendors. We define gender equality as the access to rights or opportunities unaffected by gender.

- We provide equal employment opportunities to all qualified candidates and employees.

- We examine our unconscious biases and take steps to create an inclusive culture that makes every employee feel welcome.
- We treat our colleagues with respect and no form of discrimination based on gender, race, disability, nationality, religion, age, or sexual orientation is acceptable.
- We will not engage in any activity that will result in harassment and violent behaviours including derogatory comments, spreading of malicious rumours, or using any forms of communication to transmit derogatory or discriminatory material.

Learn More

- Modern Slavery Policy (POL-COM-006).
- Recruitment and Selection (POLHR004).
- Gender Equality in The Workplace (POLHR002).
- Domestic and Family Violence Leave Policy (POLHR001).
- Anti-Discrimination, Bullying and Harassment (HPR06).

8. Health and Safety

Novotech strives to provide a safe, secure, and healthy working environment. We create and maintain a safe working environment by:

- Ensuring that workplace free from hazards,
- Ensuring protective devices are in good working condition,
- Exercise ethical use of energy and resources in the office to prevent wastage; and,

- Complying with the occupational safety and health laws and regulations of any country.

Learn More

- Work Health & Safety Policy (GEN03).

9. Anti-Bribery and Anti-Corruption / Anti-Money Laundering/Fraud

At Novotech, we do not tolerate any forms of corruption, extortion, bribery (including facilitation payments), fraud, and money laundering.

It is our core value to insist on integrity and honesty in business interactions where the legitimacy of the business is fundamental.

We will not directly or indirectly promise, offer, receive, grant, or authorise the giving of money or anything of value to influence anyone while dealing with matters related to Novotech.

Learn More

- Anti-Bribery and Anti-Corruption (POL-COM-005).

10. Fair Business Practices

Novotech supports the principle of free-market competition as a basis for conducting its business and observes applicable competition laws and regulations.

We will not participate in the violation of competition laws.

11. Protection Of Intellectual Property

We value intellectual property rights (such as trademarks, copyrights, trade secrets, "know-how", and patents) as valuable assets.

We will not use Novotech or the client's intellectual property or other confidential information or property for any business or commercial venture without pre-clearance from the approving parties.

We will seek advice from the Line Manager before soliciting, accepting, or using proprietary information from individuals outside the company or before granting them access to Company's information.

12. Privacy And Confidentiality

Novotech regards information for its business as a corporate asset that must be protected against loss, infringement, and improper use and disclosure.

We are committed not to make use of information disclosed by a third party if it is suspected that the discloser violates the obligation of confidentiality unless under exceptional circumstances in the agreement.

We will ensure:

- All Company information is protected by adequate security measures.
- There is a Confidentiality Agreement prior to exchanging information with an external party.
- When collecting and processing personal information, comply with applicable laws and the Company's privacy and personal information policy.

Learn More

- Confidentiality and Privacy Policy (POL-COM-002).

13. Subject Matter Of Clinical Trials

Novotech complies with Good Clinical Practice in the conduct of clinical trials and related services and is committed to protecting the safety of clinical trial participants throughout the clinical trial process.

Novotech acknowledges that Institutional Ethics Committees (IEC) or Institutional Review Boards (IRB) exist within hospitals and site networks and that those Committees will separately assess clinical trial protocols from the perspective of safeguarding the rights, safety and well-being of clinical trial participants.

As a clinical research organisation adhering to GCP, Novotech also adheres to these guiding principles of clinical trial participant safety in relation to the conduct of clinical trials and associated services. Novotech considers those principles when it assesses opportunities with sponsors of clinical trials and is committed to conducting clinical trials that are scientifically valid.

Novotech subscribes to the overarching principle that a clinical trial should have the primary purpose to further the health outcomes of clinical trial participants. For example, we are unlikely to conduct clinical trials where the clinical trial subject matter and/or protocol involves the use of alcohol or tobacco or related products. The Quality and Safety Subcommittee of the Novotech Board will review any clinical trials conducted or proposed to be conducted by Novotech where concerns have been raised in relation to the subject matter of those clinical trials.

Appendix

None.

Related Documents

- GEN03
- HPR06
- POLHR001
- POLHR002
- POLHR004
- POL-COM-002
- POL-COM-003
- POL-COM-005
- POL-COM-006
- Work Health & Safety Policy
- Anti-Discrimination, Bullying and Harassment
- Domestic and Family Violence Leave Policy
- Gender Equality in The Workplace
- Recruitment and Selection
- Confidentiality and Privacy Policy
- Whistleblower Policy
- Anti-Bribery and Anti-Corruption
- Modern Slavery Policy

References

None.

Novotech is internationally recognized as the leading Asia Pacific centred Biotech Contract Research Organization (CRO) with global execution capabilities.

Novotech is a clinical CRO with labs, phase I facilities, drug development consulting services and FDA regulatory expertise and has experience in over 5,000 clinical projects,

including Phase I to Phase IV clinical trials and bioequivalence studies. Novotech is positioned to serve biotech clients conducting clinical trials in Asia Pacific, the US and Europe. Novotech has over 3000 staff globally and 34 office locations.

novotech-cro.com/our-company

| Role | Title | Signature and Date |
|-------------|-------|--------------------|
| Author | | |
| Approver | | |
| Reviewer | | |
| QA Reviewer | | |

| Version | Effective Date | Reason for Revision |
|---------|----------------|--|
| 1.0 | 09-Dec-2022 | New NHH Policy. |
| 2.0 | 01-Jan-2024 | New branding and updated conflict of interest section. |
| 2.1 | 01-Apr-2024 | New tagline on the logo. |