



Code Of Conduct For Vendors

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Novotech is committed to the highest professional and ethical standards of behaviour and to supporting a culture of honesty and integrity in compliance with the laws and regulations applicable to our business. As part of this commitment, we seek relationships with vendors who uphold similar ethical business values and principles.

This Code sets forth the basic requirements we expect of our vendors as a condition of doing business with Novotech. Novotech may perform activities to assess compliance with this Code including physical assessment of facilities, use of questionnaires and review of available information. Novotech may disqualify any potential vendor or terminate any relationship with the existing vendor that fails to meet the minimum expectations as set out in this Code.

Guidance On Code

If you need assistance to understand the expectations and responsibilities as set out in this Code or are uncertain how some aspects of that the Code are applicable to our business relationship, you may seek guidance from Novotech's Compliance Department at compliance@novotech-cro.com.





Modern Slavery and Fair Work Practices

Novotech is committed to respecting and promoting fair work practices, 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 relationships.

Novotech expects its vendors to:

- Provide equal access to employment opportunities;
- Provide a workplace free from discrimination, bias and harassment;
- Promote an inclusive environment that respects dignity and diversity including implementing relevant policies and practices;
- Ensuring payments made to its people in accordance with applicable laws and regulations;
- Prohibit any form of modern slavery practices in its operations and supply chain.



Health, Environmental and Safety

Novotech strives to provide a safe, secure, and healthy working environment and we expect our vendors to ensure, so far as is reasonably practicable, to (as applicable):

- Implement adequate hazard control and precautionary measures for proper storage and disposal of hazardous materials;
- Provide necessary facilities and equipment to assure the health, safety, and well-being of employees and visitors;
- Identify potential emergencies, implement preventive measures and training, and maintain emergency response procedures;
- Provide safety and health information related to hazardous materials and necessary occupational health and safety training; and
- Promote a culture of safety and well-being such as promoting access to health programs that positively impact the physical and mental health of its people.



Financial Integrity

Novotech does not tolerate any forms of illegitimate payment or payment that may inappropriately influence others such as corruption, extortion, bribery, illegal facilitation payments, or money laundering. Uncompromised integrity is one of our core values and honesty in business interactions is fundamental.

Novotech expects its vendors to:

- Comply with all applicable laws and regulations in relation to illegitimate payments and refrain from offering items of value that may inappropriately influence others to promote or perform novotech services, whether provided directly or through a third party;
- Ensure appropriate anti-bribery and anti-corruption training is provided to its people;
- Maintain proper financial books and records; and
- Respect and adhere to novotech's policies regarding gifts and entertainment when interacting with novotech's representatives. (Should a business need arises, kindly seek information about novotech's gift and entertainment policies from your novotech point of contact).

If any of these issues arise during your business relationship with Novotech, please report it immediately through the whistleblowing channel listed below.



Protection of Intellectual Property

Novotech values its and its customers intellectual property. Novotech will take necessary action to protect its intellectual property.

Novotech expects its vendors to:

- To respect all intellectual property (ip) rights. Any transfer of technology and know-how must be done in a manner that protects intellectual property rights;
- To only use software that has been legitimately acquired and licensed, in accordance with their respective terms of use or license when performing services for Novotech or its customers; and
- To protect Novotech's and its customers information in the manner instructed by Novotech.



Privacy and Confidentiality

Novotech regards its confidential information and any personal information held by it as information that must be protected from loss, infringement, improper use and disclosure.

Novotech expects its vendors to:

- Keep all information provided by Novotech or its customers confidential and secure at all times and only used for the purpose for which it was provided;
- Protect that information against disclosure without the prior written consent of Novotech.

Novotech also expects our vendors to safeguard personal information in accordance with the applicable laws and adopt best practices for the protection of information.

Novotech expects its vendors to:

- Comply with cross-border data transfer requirements as required by applicable laws and regulations, including data transfer agreement(s) with subcontractors;
- Ensure that privacy requirements are implemented by any subcontractors;
- Ensure the appropriate technical and administrative controls are in place to allow Novotech to comply with applicable privacy laws;
- Report any incident or suspected incident to Novotech that affects the confidentiality or integrity of personal information to ensure that Novotech and its customers are able to meet any reporting and other obligations;
- Follow appropriate safeguards in relation to health and/or sensitive information such as de-identification or pseudo anonymization;
- Secure confidential and personal information at all times including during collection, transfer storage, archive and destruction;
- Only use information for the purpose agreed with Novotech; and
- Provide appropriate privacy and confidentiality training to their people.



Information Management and Security

Novotech manages its and its customers information with appropriate information security practices designed to safeguard data and systems.

Novotech expects its vendors to:

- Maintain processes and standards procedures to maintain data confidentiality, integrity, and availability, to ensure data is protected, complete, accurate, and timely;
- Create, control, and secure documents and records, while adhering to applicable compliance requirements;
- Manage risks such as incidents, product-related emergencies, business operations/continuity issues and non-conformance through monitoring and incident response procedures. Such events must be reported to relevant regulatory authorities and/or Novotech, where appropriate;
- Set performance goals and objectives, including improvement of complaint investigations, corrective actions, and internal audit procedures; and
- Provide training that achieves appropriate levels of knowledge, skill, and competence in management and workers, to address these expectations;



Interactions with Healthcare Professional

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

Novotech expects its vendors to:

- Ensure appropriate good practice training is provided to all individuals employed or appointed by them, including their affiliates or subcontractors.
- Avoid any action that could inappropriately influence healthcare professionals to use the vendor's products and services.
- Maintain proper financial books and records in relation to any payments made to healthcare professionals.



Quality

Novotech is committed to delivering a consistent and high-quality service to our customers.

Novotech expects its vendors to:

- Establish and maintain quality requirements to protect the integrity of the goods and services provided to Novotech in accordance with applicable laws, regulations, and contractual terms;
- Continuously improve the quality and efficiency of processes;
- Support Novotech or an authorized delegate to conduct quality audits and/or assessments of the facilities, systems, and/ or documents related to the goods and services provided and promptly provide responses and take corrective actions to remedy any observations cited;
- Where applicable, maintain compliance with the global standards of Good Clinical Practices;
- Not at any time, use in any capacity, in connection with the supply of its goods and/or performance of its services, the services of any person debarred or proposed for debarment under 21 U.S.C. § 335(a) or (b); or Subsection 306(a) or (b) of the Federal Food, Drug and Cosmetic Act, or otherwise disqualified or suspended from performing clinical research study, or otherwise subject to any restrictions or sanctions by the Federal Drug Administration or any other regulatory authority or professional body with respect to the performance of scientific or clinical investigations.



Conflict Of Interest

Conflicts of interest represent a critical concern in the vendor-customer relationship, and vendors must be vigilant in their efforts to prevent and manage them. A conflict of interest arises when a vendor's personal, financial, or other interests clash with their ability to provide the best possible service or product to Novotech.

Novotech expects its vendors to:

- Establish clear internal policies and procedures to identify, assess, and manage conflicts of interest proactively.
- This includes periodic training for their people and implementing mechanisms to prevent situations where personal interests might interfere with the delivery of quality products or services.
- By doing so, vendors demonstrate their commitment to ethical business practices and set a standard of excellence that enhances their reputation and builds trust over time.
- Vendors should disclose any conflicts of interest (perceived or actual) to Novotech prior and during the business relationship.

Sanctions

At Novotech, we are committed to conducting our business with the utmost integrity, respect for, and compliance with, international laws and regulations. This includes strict adherence to any trade controls and sanctions imposed by governments and international bodies. We recognize that these measures are in place to promote global security and ethical business practices.

All vendors of Novotech must strictly adhere to any trade controls and sanctions applicable to their respective regions. This includes compliance with export controls, import restrictions and economic sanctions. We are committed to conducting our business in a manner that upholds the highest legal and ethical standards.

Novotech prohibits engagement with or providing products, services or support to entities or countries that are subject to trade controls or sanctions. We maintain a comprehensive list of such entities and countries and regularly screen our business partners to ensure compliance with these sanctions.

Failure to comply with trade controls and sanctions can have serious legal, financial, and reputational consequences. Novotech expects its vendors to ensure full compliance with trade laws, regulations, and sanctions always.

Reporting and Whistleblowing

If you become aware of any violation of the Code, you may report your concern via our whistleblowing channel at <https://www.whistleblowingservice.com.au/novotech/> or email **compliance@novotech-cro.com**.

Novotech will not retaliate on any individual who reports or participates in an investigation of a suspected violation of our Code. If you believe you are being retaliated against, please report it through our whistleblowing channel.

Revision to the Code

This Code will be periodically reviewed and is subject to updates. Novotech will notify vendors of significant changes to the requirements within this Code.

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

REVISION HISTORY

Version	Effective Date	Reason for Revision
1	1-Jan-24	New NHH Policy.
1.1	1-Apr-24	New Logo