

SUPPLIER CODE OF CONDUCT



SwiftPharma.



INTRODUCTION

SwiftPharma BV, is a biotechnology company active in the research and development of recombinant protein production using a plant-based production platform. Our company provides technology, products and services to create, understand, and master biology that contributes the shaping the future of human, animal, and planet health.

SwiftPharma BV is committed to the Ten Principles of the United Nations Global Compact, treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible, and ethical operations.

As a supplier to SwiftPharma BV, you are an essential part of our corporate structure and therefore we expect you and your suppliers to also commit to the following social, environmental, and ethical responsibilities.





**HUMAN RIGHTS
AND LABOR
CONDITIONS**

SwiftPharma BV, is rigorously committed to supporting the protection of internationally proclaimed human rights of workers and treating them with respect and dignity. This applies to all workers, including, but not limited to, temporary, student, migrant, contract, direct employee, and any other type of worker. Suppliers shall pledge and conduct their business and operations in a way that it is possible to identify, prevent, mitigate and account for negative human rights impacts.

2.1. Modern slavery and forced labor

Suppliers are expected to prevent any involvement in any forms of modern slavery and forced labor throughout its supply chain by having adequate policies, risk assessment and due-diligence processes in place. All work should be voluntary on the part of the employee and the supplier as an employer must provide all employees with a written contract in a language they understand clearly, indicating all employment terms and conditions.

2.2. Child labor

Suppliers must ensure that child labor is not used in any performance of any work. “Child” means any person under the minimum legal age for employment where the work is performed, and/or the minimum working age defined by the International Labor Organization (ILO), whichever is greatest. All workers under the age of 18 shall not be exposed to work that is likely to harm their health, physical, mental, social, spiritual, or moral development.

2.3. Working hours and leave

Suppliers are expected to comply with applicable laws and ILO standards regulating working hours and leave, maintaining reasonable working hour schedules for its employees and providing a rest period of at least 24 consecutive hours in every week. All hours worked beyond the default schedule shall be voluntary and the collective bargaining agreements shall be respected.

2.4. Wages and benefits

All supplier's employees must receive at least the minimum wage required by local laws and provide all legally requisitioned benefits. In addition, suppliers must always comply with the collective bargaining agreements and provide its workers with information regarding their employment terms and conditions in a language spoken by them. We encourage suppliers to adopt a fair payment structure that matches the employee skills.

2.5. Non-discrimination and fair treatment

Suppliers must ensure that all employees are treated with utmost dignity and respect, eliminating all discrimination in respect of employment and occupation, providing equal employment conditions and opportunities based on each worker's skills and experiences, not discriminating any job applicants based on race, color, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, covered veteran status, body art, among others. Workers' religious practices will be reasonably accommodated. Suppliers must prevent any involvement in any kind of harassment, abuse, corporal punishment or inhumane treatment.

2.6. Freedom of association and collective bargain

All employees shall have the right to associate freely, seek representation and bargain collectively in accordance with local laws. Supplier is expected to respect the rights of workers to communicate openly, making possible for all employees to share grievances with management about labor conditions with no fear of harassment.







INFORMATION PROTECTION

3.1. Sensitive, confidential, and proprietary information protection

All sensitive, confidential and proprietary information must be protected in an efficient manner by our suppliers, and it is crucial that all suppliers comply with all data privacy laws and regulations.

The supplier shall respect SwiftPharma's and others' confidential information and intellectual property, including personal data/information, from mishandling, misuse, theft, counterfeit, fraud or any improper disclosure, including diminishing risk to digital systems and documents by executing appropriate IT cyber security programs, using encryption and strong passwords. IT suppliers should provide work, services, tasks and deliverables in compliance with the agreed industry standards and practices, which may include some of the following: ISF Standard of Good Practices for Information Security and ISO 27001, ISO 27002, ISO 22301, ISO 22313 and ISO 27031 standards.

In case of any data breach or suspicion of a possible security incident, all suppliers are expected to immediately communicate with SwiftPharma BV.

3.2. Working hours and leave

The compliance with all applicable laws regarding intellectual property and protection against disclosure is required from all suppliers.



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**ENVIRONMENT,
HEALTH, AND
SAFETY**

4.1. UN Sustainable Development Goals

The UN Sustainable Development Goals (SDGs) aim to end poverty and inequality, protect the planet and ensure that all people enjoy health, justice and prosperity. Since 2015, all countries in the United Nations adopted the 2030 Agenda for Sustainable Development. SwiftPharma BV is working towards these goals and our suppliers are expected to act in a similar way, so that together we help in transforming our world for the better.

4.2. Environmental, health, and safety management system

Considering the environmental risks normally present in a business operation, we expect our suppliers to conduct its activities aiming to minimize these risks. It is desirable that our suppliers establishes an adequate environment management system (such as ISO14001 or comparable), adheres to policies and procedures to embrace environmental aspects into its operations, supply chain and products. A health and safety management system (such as ISO42001 or comparable) is also advisable to be implemented by our suppliers, as well as policies pursuing the protection of health, safety and welfare of employees, contractors, visitors among others that may be affected by their occupation. The working environment must be under good sanitary conditions and the supplier should take reasonable measures to secure that worker's performance and safety is not compromised by controlled substances, alcohol, legal and illegal drugs.

4.3. Substances and chemical management

Any potentially hazardous substances in chemical products and articles used in supplier's products must be identify as such by supplier. The supplier must ensure that these substances are handled, transported, stored, recycled and disposed of safely.

4.4. Sustainable product and process development

Suppliers are expected to make their best effort to develop, manufacture and deliver innovative products and processes with the lowest possible environmental impact. The aspiration is that our suppliers should reduce their climate change impact, use energy, water and natural resources in an efficient manner, reduce waste and use of hazardous materials, utilize reusable and/or recycled packaging material and manage their emission in the air.







**GOVERNANCE
AND
MANAGEMENT**

Employees and third parties must be able to seek advice or raise ethical or legal concerns without fear of retaliation through adequate reporting channels such as a whistle-blower platform or anonymous hotline. If a report is made, our suppliers are expected to address those cases in an ethic manner and prevent retaliatory action.





**PRODUCT
SAFETY**

SwiftPharma is shaping the future of health and for that reason we expect that all of our suppliers ensure that their products and services follow maximum quality and safety standards. Any accident/incident that may result in any product safety issues must be reported by our suppliers immediately in order to avoid the sale or use of a faulty product by any SwiftPharma company or its distributors.







**BUSINESS
ETHICS**

7.1. Anti-corruption laws

All anti-corruption laws and regulations applicable to our supplier's obligations towards SwiftPharma BV must be observed and complied with. It is also desirable that our suppliers establish a compliance program aiming to mitigate the existing risks of its activities and to prevent corruption in different situations such as commercial contracts, partnerships, projects, and the use of contractors or similar. Our suppliers shall not be involved with, endorse nor tolerate any form of bribery or corruption, directly or indirectly and no improper benefit shall be offered or accepted by any of their employees and representatives.

7.2. Illegal payments

No illegal payments or anything of value from any customer, supplier, representatives, agents, government officials, political parties or others must be offered or accepted by our suppliers and/ or their employees. "Illegal payments" includes payments aiming to expedite or secure performance of a routine governmental such as customs clearances or visa expedition, with exception of formal legal governmental fees for such services. It is expected that our suppliers restrain their employees from equal or similar conduct in order to gain improper advantage, even in areas where such behavior may not violate local regulations or laws.

7.3. Competition and antitrust

Our suppliers shall respect and comply with all applicable anti-trust, competition and fair-trade laws and regulations and shall not enter into any anti-competitive arrangements like illegal price-fixing, limiting supply or allocating/controlling markets or any other illegal restrictive practices that would restrain or impact competition.

7.4. Insider trading

Any material or non-publicly information disclosed by any employee of SwiftPharma to our suppliers must not be used for trading or empower third parties to trade in the stock or securities of any company.

7.5. Gifts and courtesies

It is desirable that our suppliers achieve their business goals based on their products, services quality, and performance. The use of gifts and courtesies aiming to reach competitive advantage will not be tolerated by SwiftPharma BV. Whenever offering or receiving a gift or business courtesy in any business relationship, our suppliers are responsible to make sure that such conduct is consistent with reasonable marketplace customs, allowed by applicable laws and regulations and that such act does not infringe the rules and standards of the recipient's organization. Under no circumstances the acceptance or offering of cash gifts or cash equivalent should be authorized.

7.6. Conflict of interest

Aiming to demonstrate that our suppliers are reliable and honest partners, doing business in a transparent and open manner is crucial, avoiding situations where private, financial or other external interests' conflict with our supplier's work responsibilities. If any SwiftPharma BV employee or anyone performing a work for SwiftPharma BV may have a personal interest of any kind in our supplier's business or any kind of financial link with our suppliers, this situation must be communicated to SwiftPharma BV and all affected parties through one of the available reporting channels found on the SwiftPharma BV webpage; www.swiftpharma.eu under Whistleblower.







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