ellab

YOUR LIFE SCIENCE COMPLIANCE PARTNER



Supplier Code of Conduct

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Introduction

The Ellab Group is committed to conducting business ethically and sustainably in alignment with internationally recognized standards, applicable local laws, and principles of human rights and environmental protection, striving to create a positive impact on society and the environment worldwide. This Supplier Code of Conduct (the "**Code**") establishes minimum standards for all suppliers and service providers to help reduce supply chain risks and promote transparency across global operations.

This Code applies to all suppliers and service providers, regardless of location, and forms a mandatory, integral part of any agreement with an Ellab Group entity - including vendors, distributors, and other business partners. By entering into any business relationship with the Ellab Group - such as supplying goods or services - the supplier acknowledges and agrees to comply with this Code.

Audit and Sub-Suppliers

This Code is an end-to-end supply chain initiative. Thus, suppliers must ensure that their own suppliers adopt equivalent or materially comparable standards to guarantee compliance throughout the supply chain. Before engaging any third party involved in delivering goods or services on your behalf, you must ensure that such party complies with this Code, applied mutatis mutandis.

Ellab reserves the right to audit suppliers and sub-suppliers to verify compliance with this Code.

Publication and Updates

This Code is available online at Ellab's website on Sustainability section. Ellab may update this Code periodically, and updates take effect upon publication. Suppliers are responsible for reviewing the latest version regularly to ensure ongoing compliance.

Reporting Non-Compliance

Ellab expects all suppliers to uphold the standards outlined in this Code globally. In case of non-compliance, suppliers must notify Ellab immediately and actively collaborate to implement corrective actions. Ellab reserves the right to suspend or terminate the contractual relationship for breach if compliance is not achieved.

Suppliers are expected to:

- Maintain documentation demonstrating compliance with this Code and applicable laws.
- Communicate this Code effectively to relevant internal and external stakeholders.
- Continuously improve performance through measurable objectives.
- Implement systems to identify and manage risks in all areas addressed by this Code.
- Any deviation from this Code must be reported to: legal@ellab.com.

Ethical and Labour Practices

Human- and labour rights

Ellab promotes workers' rights, fair working conditions and prevent exploitation within our own operations and supply chains. As a result, all suppliers must demonstrate respect for workers' rights and ensure compliance with national laws and international labour and human rights standards, and we expect and demand all suppliers to ensure a healthy and safe working environment for its employees. Further, Ellab maintains a zero-tolerance policy towards discrimination, harassment, abuse or violence, and we expect all suppliers to uphold the same level of integrity for its employees.

Specifically, Ellab expects all suppliers to:

- Ensure that wages and benefits meet or exceed national standards or collective bargaining agreements.
- Promote equal opportunities and treatment for all employees.
- Respect workers' right to join or form trade unions and engage in collective bargaining.
- Comply with anti-slavery and human trafficking laws.
- Ensure that all labour is voluntary and that workers have freedom of movement and the right to terminate their employment.
- Not employ workers below the minimum legal age for employment.
- Ensure a workplace free from harassment, abuse, and violence.
- Provide accessible and effective mechanisms for workers to raise concerns and complaints.

Business ethics & Anti-Trust

Ellab is committed to conducting business ethically and with the highest standards of integrity across all global operations. As part of this commitment, all forms of bribery, corruption, and abuse of power are strictly prohibited and will not be tolerated under any circumstances.

We expect our suppliers to uphold these same principles and to conduct their business in a lawful, transparent, and responsible manner. Suppliers must implement effective measures to prevent, detect, and eliminate unethical practices, including but not limited to bribery, kickbacks, facilitation payments, and any other conduct intended to gain improper advantage.

To support a fair and competitive marketplace, suppliers are also required to promote and maintain free and fair competition in all business dealings. Anti-competitive behaviour such as price fixing, market allocation, bid rigging, or abuse of dominant position is strictly prohibited.

Specifically, Ellab expects all suppliers to:

- Maintain and enforce a clear policy prohibiting bribery and corruption and avoid conduct that could be perceived as improperly influencing business decisions, including offering gifts, hospitality, or other benefits.
- Implement effective internal controls and compliance programs to prevent, detect, and respond to violations.
- Protect whistleblowers from retaliation and ensure safe, confidential channels for reporting concerns.
- Disclose any actual or potential conflicts of interest that may affect their

ability to perform services for Ellab impartially and manage such conflicts appropriately.

- Adhere to all applicable laws and regulations governing antitrust and fair competition and refrain from engaging in anti-competitive practices such as price fixing, market allocation, or bid rigging.

Information Security, Privacy & AI Governance

As the Ellab Group operates in a sector critical to public welfare, we are committed to safeguarding essential business processes and ensuring the confidentiality, integrity, and availability of our services and products. Suppliers are expected to promote these principles throughout their own supply chains to support end-to-end resilience and protection. Suppliers must use Ellab's confidential information only for authorized purposes and protect it against unauthorized access, misuse, loss, alteration, or disclosure. They must respect intellectual property rights and may not use Ellab's name, trademarks, or products, or those of its affiliates, in publicity or advertising without Ellab's prior written consent.

Where their activities may affect Ellab's information, systems, products, or business continuity, suppliers must maintain an information security program proportionate to risks involved and informed by recognized industry frameworks. Depending on those risks, safeguards may include access controls, secure authentication, staff awareness, vulnerability management, and backup and recovery arrangements.

Suppliers providing software or connected products must apply secure development practices and address vulnerabilities during the agreed support period. Beyond this Code, certain suppliers may be required to accept additional contractual obligations designed to ensure a minimum level of cybersecurity awareness.

Any actual or suspected cybersecurity incident, data breach, urgent vulnerability, or significant service disruption that may affect Ellab must be reported promptly to InfoSecAlerts@ellab.com. Suppliers must cooperate in investigating and resolving the matter. Suppliers must comply with applicable data protection laws and regulations, where relevant. Those processing personal data on Ellab's behalf must follow an appropriate data processing agreement. Ellab information must be securely returned or deleted, and related access removed, when no longer required, subject to applicable laws and regulations.

Where artificial intelligence (AI) is used to provide goods or services to Ellab, suppliers must comply with applicable law and regulations, including the EU AI Act, manage associated security, privacy, and quality risks, and respect intellectual property and fundamental rights.

Supplier must inform Ellab of AI use that materially affects deliverables, decisions and involvements for Ellab, or the handling and processing of Ellab information, and apply appropriate human oversight. Ellab confidential information or personal data must not be entered into AI systems without authorization and implementing appropriate safeguards.

Sanctions and Exports controls

As a conscientious global enterprise, Ellab does not conduct business with, or in any way engage in any activities that violate international sanction- and export laws applicable to Ellab's operations, including those imposed by the United Nations, the European Union, the United Kingdom and the United States. Ellab expects that our suppliers also act in accordance with these fundamentals laws and regulations and implement efficient procedures and policies to that account. We expect that due diligence procedures are in place, when appropriate, to support compliance with these obligations.

Environmental Responsibility

Ellab expects all suppliers to operate in an environmentally responsible manner - striving to minimize negative environmental impacts and to preserve natural resources - and in compliance with all applicable environmental laws and regulations in the jurisdictions where they conduct business. This includes, but is not limited to:

- Obtaining, maintaining, and renewing all required environmental permits, licenses, registrations, and certifications.
- Take action to reduce greenhouse gas (GHG) emissions and set measurable targets supporting carbon reduction ambitions.
- Take measures to improve efficiency and reduce the consumption of resources.
- Reuse or recycle any waste when it is environmentally favorable and technically feasible to do so.
- Have a plan to pursue sourcing renewable energy and continuously explore the possibility of increasing their renewable energy share.
- Have systems in place to ensure safe handling, movement, storage, disposal, recycling, reuse or management of raw materials, waste, air emissions and wastewater discharges.
- Comply with RoHS, REACH, and other material safety regulations.
- Carry out due diligence on the source of critical raw materials to promote legal and sustainable sourcing.
- Identify, document, and disclose any use of conflict minerals in their products or supply chain in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Health & Safety

Suppliers shall ensure a safety and healthy work environment for all employees. This includes implementing appropriate Health and safety policies, procedures and practices in compliance with applicable law. These standards must also extend to contractors, subcontractors, and any third parties operating on supplier premises.

Specifically, Ellab expects all suppliers to:

- Ensure a safe and healthy workplace and accommodation in line with applicable national laws and regulations.
- Prevent accidents and injury to health arising out of, linked with, or occurring in the course of work.
- Provide sufficient fire exits, escape routes and firefighting equipment and ensure that safety information relating to hazardous materials is available to educate, train, and protect workers from hazards.

Management Systems

Suppliers shall implement and maintain management systems that support continuous improvement and ensure business continuity in alignment with this Code.