Novellas Healthcare Supplier Code of Conduct

A message from our Management

Integrity is the quality of being honest and having strong moral principles. It is also the state of being whole and undivided. That is why integrity forms the basis for our Code of Conduct.

Novellas Healthcare is dedicated to run its business according to the highest standards of integrity and ethical practice in all areas. Our Code of Conduct has been developed to help us protect the people at Novellas Healthcare and prevent us from damaging our reputation and our business.

We expect our suppliers to adhere to the same standards of conduct and behavior that we expect from our own employees while suppliers are executing their services or delivering their products to Novellas Healthcare. That means doing the right thing for the right reason, even when no one is watching. Our Supplier Code of Conduct is based on those principles.

WHY A CODE OF CONDUCT?

At Novellas Healthcare we are committed to demonstrate integrity and honesty, and behaving ethically towards our employees and in all of our business practices. We expect our employees and all people acting on our behalf or having any business relationship with Novellas Healthcare to conduct their business according to the highest business standards.

To further strengthen these commitments, we have adopted the present Code of Conduct, which provides guidance in respect of the complex corporate compliance requirements and business ethics challenges weface every day. This Code of Conduct is the framework within we expect our employees and business partners to act and operate in when performing their work. It reflects the standards of integrity we believe in and according towhich we expect you to run your business.

HOW TO USE OUR CODE OF CONDUCT?

Who does our Code of Conduct apply to?

This Code applies to anyone – including suppliers, vendors, contractors, licensees, and agents (collectively, "**Suppliers**") that supply products and/or services to Novellas Healthcare. This Code defines our minimum expectations. Novellas Healthcare must, directly or indirectly, through its subcontractors, comply with all international, national, country, and local laws and ordinances and all lawful orders, rules, regulations, codes, standards and treaties.

Who can you go to if you have a question about our Code of Conduct ?

You can always reach out to the Novellas Healthcare team via e-mail (info@novellashealthcare.com).
We will be happy to clarify and assist.

Where can you find additional guidelines?

Our Code of Conduct cannot cover every eventuality or local particularity. If a specific situation arises which is not covered by our Code of Conduct, your agreement with Novellas Healthcare or other policies or guidelines, the situation will be examined in the light and the spirit of our Code of Conduct and in accordance with applicable laws. In all cases your agreement with Novellas Healthcare will apply and will prevail in case of discrepancies.

In any case, if you require additional information regarding the guidelines set out by Novellas Healthcare or your agreement, feel free to reach out and we will be happy to assist.

Novellas Healthcare & Quality

The Management of Novellas Healthcare has a strong commitment towards Quality and Compliance. We have created a solid Quality Management System (QMS) within our organization, which ensures us to maintain high-level quality and compliance of all our services throughout their life cycle, in full compliance with the applicable regulations and other health-related requirements.

To ensure the quality of services, Novellas Healthcare has based its quality management on the requirements of ISO9001:2015. With this approach, Novellas Healthcare wants to engage in meeting the expectations and requirements of our customers and ensure to align the internal management of the organization as such.

With a clear knowledge of our customers' expectations, we strive to consistently meet and exceed them. Therefore, we adhere to all applicable standards and customer specific requirements and endeavor to provide and implement processes that ensure building a robust and world class business while also fostering inclusion and promoting supplier diversity. Best practices at all levels and systematic research will result in reliable risk management. Driving continuous improvement, enhancing innovation that is based upon efficient business processes, setting out good measurements, rolling out best practices and customer surveys, are key objectives for Novellas Healthcare.

Quality Management system

The Novellas Healthcare QMS is based on following principles:

- The processes and methods within the organization are consistent, documented and known to all staff. Processes are set up to be as efficient as possible.
- The objectives are defined and communicated.
- The processes are monitored, analyzed and adapted if needed.
- All legal and other requirements of the stakeholders are met.
- New staff get immediate insight in the way of working.
- There is a philosophy of continuous improvement.

The individual contribution is important to the company's overall success and commitment to quality.

Novellas Healthcare has developed a set of quality documents (such as Policies, Standard Operation Procedures, Working Instructions,…), providing the Novellas Healthcare Management's view on organizational activities and covering the Novellas Healthcare processes related to its activities.

Quality and Compliance Manager

The Novellas Healthcare Management has the responsibility to demonstrate strong and visible commitment to the Novellas Healthcare QMS by taking accountability and responsibilities for these activities. To coordinate all activities, a Quality and Compliance Manager has been appointed, who will, in cooperation with the Novellas Healthcare Management oversee the implementation of the QMS across the relevant entities and ensure compliance with the related regulatory and Company requirements.

Novellas Healthcare & People

At Novellas Healthcare, people are at the heart of everything we do. We take care of our employees and those weare in contact with in our daily business as we believe this is how we will achieve our goals. We respect our employees and all people acting on our behalf. We promote individual excellence and collaborative teamwork. We treat our customers, suppliers and other business partners with consideration and dignity.

Working Conditions

At Novellas Healthcare, we are dedicated to fostering a diverse, inclusive, and equitable workplace where every individual—regardless of gender, gender identity, sexual orientation, race, ethnicity, age, ability, religion, or background—is treated with respect and dignity. Behaving ethically means not engaging in any discriminatory practices. This means that in your business relationship with Novellas Healthcare, you are expected not to engage in any direct or indirect discrimination based on age, gender, nationality, race, color, ethnic origin, sexual orientation, marital or civil partnership status, religion, political opinion, language, disability or any other status protected by laws or regulations in the locations you operate. Moreover, you should not tolerate degrading treatments such as sexual or mental harassment, disrespectful language, discriminatory gestures or any form of physical violence.

We do not use child labor and do not tolerate the use of child labor by our customers, suppliers and other business partners.

We are committed to:

- ✓ Ensuring equal opportunities in recruitment, training, career development, and daily work practices.
- ✓ Cultivating a respectful environment where all employees, partners, and clients feel safe and valued.
- ✓ Actively preventing and addressing all forms of discrimination, harassment, and bias.
- ✓ Promoting diverse perspectives and inclusive dialogue across all levels of our organization.
- ✓ Supporting systemic change that advances equity and improves access to opportunities in healthcare and beyond.

Everyone (Novellas Healthcare as well as customers, suppliers and other business partners) are expected to contribute to a culture of inclusion, fairness, and accountability.

Health and Safety

At Novellas Healthcare we are committed to protect the health and safety of our employees, visitors and contractors. We promote a safe work environment and aim for zero occupational accidents and illnesses.

Supplier must provide a safe and healthy working environment for all employees that includes appropriate controls, safety procedures, preventative maintenance, and protective equipment.

All business practices must comply with all relevant local and national laws, codes and regulations.

Human Rights

At Novellas Healthcare we are committed to respect the human rights of our employees and the people acting on our behalf, as well as those of our customers, suppliers and other business partners, in line with the all applicable Guiding Principles on Business and Human Rights.

We condemn and dissociate ourselves from all forms of slavery, torture, degrading treatment or inappropriate working conditions, and we expect our suppliers to do this as well.

Communication Guidelines for Suppliers

- ✓ Suppliers must communicate in a respectful, professional, and clear manner at all times.
- ✓ Written and verbal communications must reflect a tone aligned with our company values and standards.

- ✓ Suppliers must use designated and approved channels (e.g., email, official portals, procurement platforms) when interacting with company representatives.
- ✓ When representing the company in any capacity, suppliers must use approved templates and brand assets provided by the company.
- ✓ Unauthorized use of the company's logo, name, or identity is strictly prohibited.
- ✓ Suppliers must not disclose confidential information without written consent.
- ✓ All communications must comply with relevant data protection regulations (e.g., GDPR).
- ✓ Suppliers are not permitted to make public statements or posts referencing the company without prior written approval.
- ✓ Any media inquiries or public communication must be redirected to the company's communications team.

Sustainability

At Novellas Healthcare, we are committed to conducting our business in a responsible and sustainable manner. We recognize that our activities, and those of our suppliers and business partners, can have an impact on the environment, society, and future generations.

We aim to integrate sustainability principles into our business operations and expect our suppliers and business partners to support these efforts by acting responsibly and in compliance with applicable environmental and social standards.

This means that you are expected to:

- Comply with all applicable environmental laws, regulations, and standards in the countries where you operate
- Take reasonable measures to reduce environmental impact, including energy consumption, waste generation, emissions, and unnecessary use of natural resources
- Promote responsible use of materials and encourage recycling, reuse, and sustainable procurement practices where possible
- Support ethical sourcing practices and avoid activities that may contribute to environmental harm or human rights violations
- Conduct business activities in a way that supports long-term sustainability and responsible growth
- Continuously seek opportunities to improve environmental performance where relevant to your operations

We also encourage our suppliers and business partners to support broader sustainability initiatives related to diversity, social responsibility, ethical governance, and responsible business practices.

At Novellas Healthcare, we believe that sustainable business practices contribute to long-term value creation for our employees, customers, suppliers, patients, and society.

Novellas Healthcare & Ethics

At Novellas Healthcare we embrace ethical behavior in all our business activities. We act with integrity in our day- to-day collaboration with our customers, suppliers and other actual and potential business partners. Our decisionsare driven by fairness and by what is the right thing to do and are based on objective grounds. We avoid any conflictof interest and have zero tolerance of corruption in any form.

Conflict of interest

Suppliers must avoid actual or apparent conflicts of interest and should make sound business decisions in the bestinterests of Novellas Healthcare, undistorted by personal interests. A conflict of interest may exist whenever a suppliers' private interests or personal activities or relationships interfere or appear to interfere with the duties performed at, or owed to, Novellas Healthcare. If you discover that a personal activity, investment, interest or association could compromise – or even appear to compromise – your objectivity or ability to make impartial business decisions, disclose it immediately to your Novellas Healthcare contact person, so approval can be obtained, if appropriate.

Anti-Bribery and Corruption

At Novellas Healthcare we fully comply with all anti-bribery laws in place in the markets in which we operate. We will not engage in illegal or unethical practices and will not accept business if it requires giving or receiving a bribe.

A bribe is a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, products, loans, fees, hospitality, services, discounts,the award of a contract or any other advantage or benefit.

Bribery (or corruption) generally includes offering, promising, giving, accepting, agreeing to receive, or seeking a bribe. It can take place in both the public and private sector and can be direct or indirect through third parties.

Novellas Healthcare will not tolerate any act that involves theft, fraud, falsification, embezzlement or misappropriation of any Novellas Healthcare or customer asset. These dishonest acts are incompatible withNovellas Healthcare's values and culture.

Suppliers shall not engage in any such misconduct including, but not limited to:

- The theft of funds or property
- Misusing resources for private purposes
- Making or submitting false claims
- Forging invoices or creating fraudulent reports or documentation

- Misrepresenting the nature of transactions
- Intentionally filing false financial records or statements.

Gifts and Hospitality

Gifts are items voluntarily given without payment in return. Hospitality covers meals (breakfast, lunch or dinner) and events (such as theater, sporting events, concerts, invitations to restaurants or cocktails) taking place between a Novellas Healthcare employee or person acting on behalf of Novellas Healthcare and an actual or potential customer, suppliers business partner or other third party.

At Novellas Healthcare we believe that receiving or offering gifts and hospitality helps building solid and trustful business relationships. However we must ensure that the exchange of gifts and hospitality between employees orany people acting on our behalf and customers, suppliers or other business partners is not excessive and does not confer improper advantage or create an actual or perceived bribe. Business decisions must be made on their meritsand must not be inappropriately influenced.

Suppliers must never offer, give, request, or receive anything of value in exchange for an improper business benefitor to improperly influence an act or decision. Gifts, travel, and entertainment that give the appearance ofimpropriety or which are illegal, lavish, frequent, vulgar, and/or in exchange for an improper business advantage are strictly prohibited. Suppliers shall ensure that any gifts, travel, and entertainment are permitted by this Code and all applicable local or other laws, regulations or policies and that they are always modest and infrequent, reasonable, properly recorded, and for a legitimate purpose.

Novellas Healthcare & Company Information

At Novellas Healthcare we believe that protecting and properly using company resources, information and property contributes to our passion for integrity and creates value for our shareholders. We take all necessary measures to protect the confidentiality of our company information as well as the information we receive from our consumers,customers, suppliers and other business partners. We expect our suppliers to take the same measures.

Relationship with Suppliers

Novellas Healthcare selects suppliers based upon quality, cost, delivery, service, diversity, reputation and long term benefit to Novellas Healthcare and its clients. Environmental practices, diversity of workforce and businesspractice will also be taken into consideration.

At Novellas Healthcare we recognize the importance of supplier diversity in promoting economic equity and supporting underrepresented businesses and we are committed to actively seeking out and engaging with suppliers from diverse backgrounds, including minority-owned, women-owned and small businesses.
We aim to evaluate suppliers not only based on cost and quality but also on their commitment to diversity, equity, and inclusion in their own practices.

Confidential Information

At Novellas Healthcare we ensure that all confidential, competitively sensitive and/or proprietary informationabout Novellas Healthcare, our customers, suppliers, business partners and other third parties is properly protected.

This means that you as supplier are expected to:

- Respect the confidentiality of other companies' information that is not in the public domain
- Assume that all information about Novellas Healthcare is confidential or competitively sensitive unless youhave clear indication that the information has been publicly released
- Protect confidential information about Novellas Healthcare at all times
- Refrain from sharing confidential information to anyone including to family and friends, except when disclosure is strictly required for business purposes; even then, take all appropriate steps, such as signing aconfidentiality agreement, to prevent misuse of the information
- Take all the necessary steps to protect documents and IT devices when away from the workplace.

Only share confidential information on a strict need-to-know basis.

Social Media and Networks

At Novellas Healthcare we support the use of social media and networks to generate new business opportunities, to recruit new talent and to promote our services. However, in order to protect our image and reputation, only a limited number of employees are authorized to represent and to talk on behalf of Novellas Healthcare on social media and networks.

This means that as supplier, you are expected to:

- Share only public news relating to Novellas Healthcare on your social media and networks
- Be transparent and state that anything you post is your own opinion.

In all cases when using social media and networks, you are expected not to:

- Share copyrighted publications, logos or other images that are protected by an intellectual property right
- Refer to Novellas Healthcare in an abusive or harassing manner, or violate their right to privacy.

Company Assets

Company assets include physical property such as facilities, supplies, computers and software, telephones, scanners, photocopiers, wireless communication devices, machinery, vehicles and company funds. They also include intangible assets such as company time, confidential information and intellectual property.

At Novellas Healthcare we use company assets honestly and efficiently.This means our suppliers are expected

(as applicable):

- To use Novellas Healthcare assets only for legitimate business purposes and protect them from theft (whether physical theft such as unauthorized removal of assets, or through intentional misreporting of timeor expenses), loss, damage or misuse
- Not to use Novellas Healthcare assets for your personal benefit or the benefit of anyone other than NovellasHealthcare.

This applies equally to company assets belonging to Novellas Healthcare and to those belonging to our customers, suppliers and other business partners. We also treat assets belonging to other employees and people who act on our behalf the same way we treat company assets.

Personal Data and Privacy

At Novellas Healthcare we are committed to respect the privacy of all individuals and the confidentiality of the personal data we hold about them.

This means that you as a supplier are also expected to:

- Keep private and protected the personal data you have access to regarding our employees, people acting on our behalf, customers, suppliers, business partners, consumers or any other individuals

- Collect, use or store personal data only if:
    - There is a valid legal ground to do so
    - It is relevant and adequate for the purpose for which it is collected
    - You keep it up to date; and only for
        - the timeframe which is necessary to meet the business objective
        - or as required by law

- Make sure you acquaint yourself with the applicable legal framework, share personal data only with authorized parties, and ensure the protection and confidentiality of those data when processing personal data.

Note: Personal data means any information relating to a natural person who can be identified, directly or indirectly, in particular by reference to a name, an identification number, location data, an online identifieror to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or socialidentity of that natural person.

Personal data include private addresses, non-business related phone numbers, identification numbers, salary and other compensation information, performance records and information relating to benefits, absences and medical history.

Information Security

At Novellas Healthcare, we recognize that information is a critical business asset and that protecting confidential, personal, client, and company information is essential to maintaining trust and ensuring business continuity. We are committed to maintaining an effective Information Security Management System (ISMS) based on the principles of ISO 27001:2022 to protect the confidentiality, integrity, and availability of information.

We expect our suppliers to maintain appropriate information security controls and to support Novellas Healthcare in protecting its information assets.

Suppliers are expected to:

- Protect Novellas Healthcare confidential, proprietary, personal, and sensitive information against unauthorized access, disclosure, loss, theft, alteration, misuse, or destruction
- Comply with all applicable data protection and privacy legislation, including the General Data Protection Regulation, where applicable
- Ensure access to Novellas Healthcare information is limited to authorized personnel on a strict need-to-know basis
- Maintain appropriate cybersecurity controls such as password protection, access controls, antivirus protection, software patching, secure networks, and encryption where appropriate
- Immediately report any actual or suspected cybersecurity incidents, data breaches, or unauthorized access involving Novellas Healthcare information or systems
- Ensure employees, contractors, and subcontractors handling Novellas Healthcare information are bound by confidentiality obligations
- Use Novellas Healthcare systems, information, and assets only for legitimate business purposes
- Ensure secure return, deletion, or destruction of Novellas Healthcare information upon termination of the business relationship where applicable

Where appropriate, Novellas Healthcare may request suppliers to complete security assessments, provide evidence of their information security controls, or comply with additional contractual security requirements.

Suppliers must cooperate with Novellas Healthcare in the event of security investigations, audits, incident management activities, or regulatory obligations related to information security.

Failure to comply with these information security requirements may impact the business relationship with Novellas Healthcare.

Responsible Use of Artificial Intelligence (AI)

At Novellas Healthcare, we are committed to using Artificial Intelligence (AI) responsibly, ethically, and in compliance with applicable legal and regulatory requirements. AI may be used to enhance our services in staffing, patient support programs, clinical research, and operational activities, but it must always be deployed in a manner that protects individuals, supports ethical decision-making, and maintains trust.

We expect our suppliers, contractors, and business partners who develop, provide, use, or support AI-enabled tools or services for Novellas Healthcare to adhere to the same principles.

AI systems must be used to support human decision-making and may not replace professional judgment where human oversight is required. Final decisions related to recruitment, patient support, clinical trial activities, or other sensitive matters must remain under the responsibility of qualified professionals.

- ✓ Suppliers must ensure transparency regarding the use of AI systems when providing services to Novellas Healthcare. Where applicable, individuals impacted by AI-supported decisions should be informed and mechanisms for human review should be available.

- ✓ Suppliers must ensure that any AI tools used in connection with Novellas Healthcare comply with applicable privacy and data protection legislation, including the General Data Protection Regulation. Appropriate safeguards must be implemented when processing personal data, confidential information, or sensitive health-related data.

- ✓ Suppliers must take reasonable measures to identify and mitigate bias in AI systems and ensure that AI is not used in a way that may result in discrimination, unethical outcomes, inaccurate conclusions, or harm to individuals.

- ✓ AI systems must be implemented in accordance with Novellas Healthcare's information security expectations and applicable controls aligned with our ISMS principles. Suppliers must ensure appropriate safeguards are in place to protect data, systems, and outputs generated by AI tools.

- ✓ Suppliers are expected to regularly monitor the performance, risks, and compliance of AI systems used in connection with Novellas Healthcare services and implement corrective actions where necessary.

- ✓ Suppliers must provide relevant compliance and risk documentation when requested, maintain appropriate staff competence, and promptly report AI-related incidents, data breaches or harmful outputs to Novellas Healthcare.

Prohibited Use

Suppliers may not use AI tools in any way that:

- ✓ Violates applicable laws or regulations
- ✓ Compromises confidential or personal data
- ✓ Creates misleading, harmful, or discriminatory outcomes
- ✓ Operates without appropriate human oversight where required

By working with Novellas Healthcare, suppliers agree to support the responsible and ethical use of AI in a way that protects people, data, and trust.

Speak Up

Report Concerns

If you are aware of a violation or potential violation of our Code of Conduct, our policies or the law, we expect youto speak up immediately (speakup@novellashealthcare.com) and report it to Novellas Healthcare so it can be addressed. By doing so, you give us the opportunity to deal with the issue. Remaining silent about possible misconduct may worsen a situation and decrease trust and can harm the company's reputation.
All reports will be handled with the necessary care and discrete.