



# TFS Supplier Code of Conduct

August 2025

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## Purpose and Scope

The purpose of this Code is to outline the standards expected of TFS service providers (as defined on page 4), including their affiliates, subsidiaries, and authorized subcontractors (hereinafter vendors and suppliers). As their activities can impact TFS's reputation and relationship of trust with clients, clinical trial participants, patients, and employees, we expect our vendors/suppliers to conduct their business ethically, responsibly, and in alignment with TFS's values and internationally recognized principles, including the Ten Principles of the United Nations Global Compact (UNGC), the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, and relevant International Labour Organization (ILO) Conventions.



# Policy Statement

TFS upholds the highest ethical, medical, and scientific standards. We are committed to ethical and lawful behavior, maintaining high standards of integrity, and complying with all applicable laws and regulations globally. We expect our vendors/suppliers to do the same and align with the principles outlined in this Code. Vendors/suppliers must also have their own Code of Conduct and have procedures in place to detect, prevent, and report misconduct or fraud.

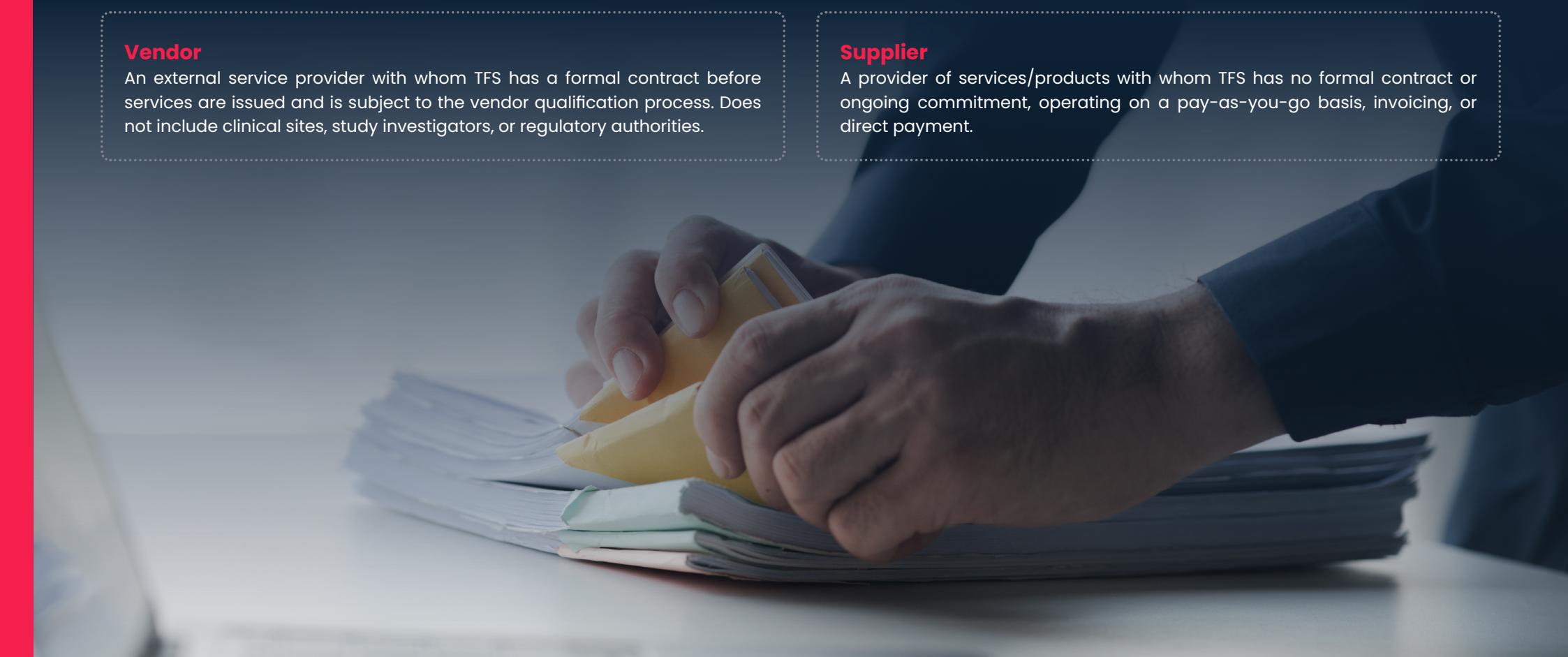
## Definitions

### **Vendor**

An external service provider with whom TFS has a formal contract before services are issued and is subject to the vendor qualification process. Does not include clinical sites, study investigators, or regulatory authorities.

### **Supplier**

A provider of services/products with whom TFS has no formal contract or ongoing commitment, operating on a pay-as-you-go basis, invoicing, or direct payment.



# Environmental Responsibility

<b>Environmental compliance</b>	Vendors/suppliers must comply with all applicable environmental regulations and operate in an environmentally responsible and resource-efficient manner.
<b>Resource efficiency and waste management</b>	Vendors/suppliers shall minimize their environmental footprint by conserving natural resources and ensuring efficient use of energy, waste, and materials. They shall avoid the use of hazardous materials where possible and implement systems for the safe handling, storage, and disposal of waste, air emissions, and wastewater in accordance with applicable laws. They shall prioritize reducing, reusing, and recycling.
<b>Energy and emissions</b>	Vendors/suppliers are encouraged to reduce greenhouse gas (GHG) emissions, adopt energy-efficient technologies, and transition to renewable energy sources in alignment with international climate agreements such as the Paris Agreement.
<b>Sustainable materials</b>	Vendors/suppliers shall prioritize the use of environmentally friendly and responsibly sourced materials to reduce lifecycle environmental impacts.



# Social Responsibility

## Labor rights and fair working conditions

Vendors/suppliers must uphold the rights of workers in accordance with local laws and international standards, including the ILO Conventions. This includes fair treatment, non-discrimination, legal wages, appropriate working hours, and mandated benefits. Vendors/suppliers must clearly communicate all aspects of compensation, including overtime pay, to workers in a timely and transparent manner.

## Human rights and due diligence

Vendors/suppliers must comply with all applicable human rights laws and conduct due diligence to proactively identify, prevent, and mitigate human rights risks. This includes acting in accordance with the UN Universal Declaration of Human rights, the UK Modern Slavery Act, the UNGPs, the UNGC, the OECD Guidelines, and the ILO Conventions. Vendors/suppliers are expected to take appropriate action to address any adverse impacts they cause, contribute to, or are directly linked to, and to provide or cooperate in remediation where applicable.

## Freedom of association

Vendors/suppliers must respect workers' right to freely associate, form or join trade unions, engage in collective bargaining, and participate in worker councils without fear of reprisal or intimidation.

## Fair treatment and non-discrimination

Vendors/suppliers must ensure a workplace free from discrimination, harassment, abuse, or harsh or inhumane treatment. All workers shall be treated with dignity and respect.

## Health and safety

Vendors/suppliers must provide a safe and healthy work environment, proactively identifying and mitigating chemical, biological, and physical hazards. They must have systems in place for emergency response, monitor safety risks in the workplace, and ensure protection for both employees and on-site visitors.

## Child labor and forced labor

TFS maintains a zero-tolerance policy toward child labor, slavery, forced labor, and human trafficking. Vendors/suppliers must not engage in or support any form of forced, bonded, or involuntary labor, and shall not employ individuals under the age of 15 or below the legal minimum working age (whichever is higher).

## Inclusive sourcing and supplier diversity

Vendors/suppliers are encouraged to engage socially and economically diverse businesses through inclusive sourcing practices that promote equal opportunity and access across their supply chains.

## Animal welfare

Where applicable, vendors/suppliers must treat animals humanely, minimizing stress and pain, and use scientifically valid alternatives in compliance with local and international standards where permitted (e.g., EU Directive 2010/63/EU, Three Rs principle: Replacement, Reduction, Refinement).

# Ethical Business Practices and Governance

<b>Business integrity</b>	Vendors/suppliers must conduct their operations with honesty and integrity, complying with applicable laws, regulations, and contractual obligations. Misconduct, including non-compliance with this Code, may result in termination of the contractual relationship, exclusion from future contracts, and legal action.
<b>Fair competition</b>	Vendors/suppliers must comply with antitrust and competition laws, and conduct marketing/sales/business activities truthfully and transparently.
<b>Anti-corruption</b>	<p>TFS has zero tolerance for corruption. Vendors/suppliers may not:</p> <ul style="list-style-type: none"><li>Offer, promise, or give anything of value to TFS employees, clients, or any third party to gain improper advantage.</li><li>Accept or request anything of value which they know or suspect is being offered to obtain an improper advantage.</li><li>Participate in any illegal inducements in business or government relationships.</li></ul> <p>Vendors/suppliers must comply with TFS's <b>Anti-Corruption and Anti-Bribery Policy</b> (a copy of which shall be provided to each vendor/supplier as part of the contract or via a link).</p>
<b>Data protection and confidentiality</b>	<ul style="list-style-type: none"><li>Vendors/suppliers must abide by signed <b>Confidential Disclosure Agreement</b>, which protects the proprietary information of TFS and our clients.</li><li>Vendors/suppliers shall safeguard and make only proper use of confidential information to ensure that the company's, workers', and patients'/clinical trial participants' privacy is protected. Where vendors/suppliers handle any personally identifiable information on behalf of TFS or our clients, then they must contractually commit to apply privacy and information security safeguards—ensuring compliance with data protection laws such as the General Data Protection Regulation (GDPR) in Europe, the Health Insurance Portability and Accountability Act (HIPAA) in the United States, or other applicable data protection laws—and sign an appropriate Data Processing Agreement.</li></ul>
<b>Whistleblowing and grievance mechanisms</b>	<p>Vendors/suppliers must:</p> <ul style="list-style-type: none"><li>Establish internal reporting mechanisms that enable employees to raise concerns without fear of retaliation.</li><li>Investigate suspected misconduct or violations.</li><li>Take appropriate corrective actions. Any suspected violation involving TFS must be reported to: <a href="https://report.whistleb.com/en/tfs">https://report.whistleb.com/en/tfs</a> or if reporter is unable to access, email <a href="mailto:tfs.legal@tfscro.com">tfs.legal@tfscro.com</a> (note: this option is non-anonymous but is treated confidentially).</li></ul>

# Supply Chain Due Diligence

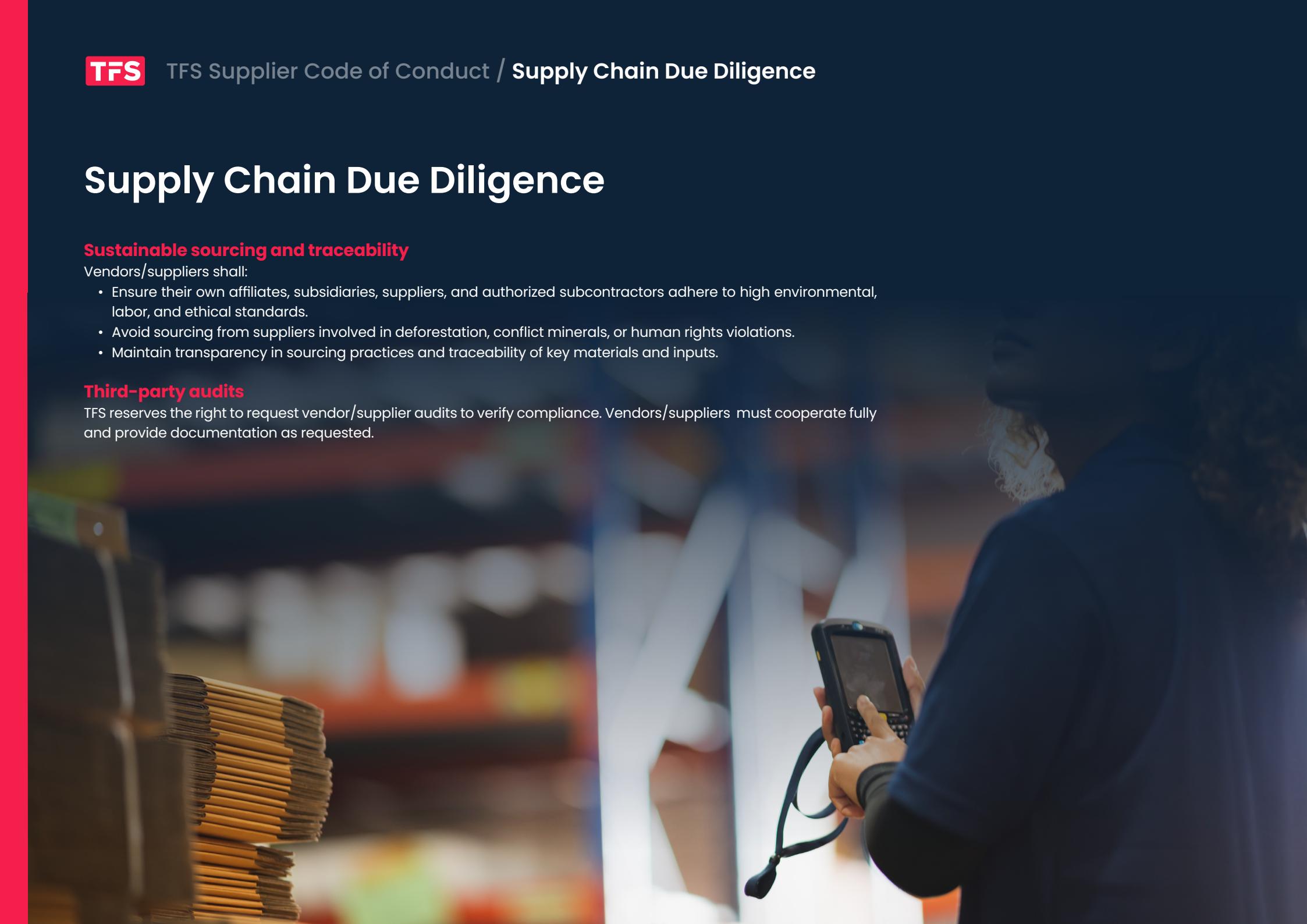
## Sustainable sourcing and traceability

Vendors/suppliers shall:

- Ensure their own affiliates, subsidiaries, suppliers, and authorized subcontractors adhere to high environmental, labor, and ethical standards.
- Avoid sourcing from suppliers involved in deforestation, conflict minerals, or human rights violations.
- Maintain transparency in sourcing practices and traceability of key materials and inputs.

## Third-party audits

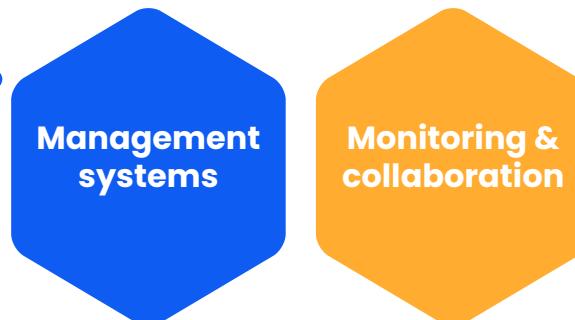
TFS reserves the right to request vendor/supplier audits to verify compliance. Vendors/suppliers must cooperate fully and provide documentation as requested.



# Continuous Improvement and Collaboration

Vendors/suppliers shall adopt appropriate management systems for continuous improvement and compliance with the principles in this Code. It is, therefore, essential that vendors/suppliers shall:

- Identify and comply with applicable laws, regulations, standards, and relevant client requirements.
- Implement mechanisms to determine and manage risks across all areas addressed in this Code.
- Keep documentation that demonstrates conformity with this Code and applicable laws and regulations.
- Train employees on this Code and their internal policies to ensure awareness of all relevant principles, standards, and regulations.
- Allocate appropriate resources to ensure compliance with this Code and their own internal policies.



TFS encourages vendors/suppliers to:

- Track and report sustainability data aligned with internationally recognized standards (e.g., GHG emissions [Scopes 1-3, where applicable], energy use, labor data [workforce composition, health and safety, and diversity, equity, and inclusion metrics]).
- Collaborate with TFS on innovative solutions to reduce social and environmental impacts and advance shared sustainability goals (learn more about TFS's sustainability efforts: <https://tfscro.com/social-responsibility-and-sustainability/>).

# Enforcement and Accountability

Failure to comply with this Code may result in corrective action, contract termination, exclusion from future business, or legal consequences. TFS reserves the right to take appropriate action in accordance with applicable laws and contracts.



# Resources

The following resources provide further context on the international standards and regulations referenced in this Code.

Framework	Available from
The United Nations Global Compact (10 Principles)	<a href="https://unglobalcompact.org/what-is-gc/mission/principles">https://unglobalcompact.org/what-is-gc/mission/principles</a>
The UN Guiding Principles on Business and Human Rights (UNGPs)	<a href="https://www.business-humanrights.org/en/big-issues/governing-business-human-rights/un-guiding-principles/">https://www.business-humanrights.org/en/big-issues/governing-business-human-rights/un-guiding-principles/</a>
OECD Guidelines for Multinational Enterprises	<a href="https://mneguidelines.oecd.org/mneguidelines/">https://mneguidelines.oecd.org/mneguidelines/</a>
UN Universal Declaration of Human rights	<a href="https://www.un.org/en/about-us/universal-declaration-of-human-rights">https://www.un.org/en/about-us/universal-declaration-of-human-rights</a>
UK Modern Slavery Act	<a href="https://www.legislation.gov.uk/ukpga/2015/30/contents">https://www.legislation.gov.uk/ukpga/2015/30/contents</a>
International Labour Organization (ILO) Conventions	<a href="https://www.ilo.org/resource/ilo-conventions">https://www.ilo.org/resource/ilo-conventions</a>
EU Corporate Sustainability Reporting Directive (CSRD) and relevant European Sustainability Reporting Standards (ESRS)	<a href="https://finance.ec.europa.eu/capital-markets-union-and-financial-markets/company-reporting-and-auditing/company-reporting/corporate-sustainability-reporting_en">https://finance.ec.europa.eu/capital-markets-union-and-financial-markets/company-reporting-and-auditing/company-reporting/corporate-sustainability-reporting_en</a>
EU Corporate Sustainability Due Diligence Directive (CSDDD)	<a href="https://commission.europa.eu/business-economy-euro/doing-business-eu/sustainability-due-diligence-responsible-business/corporate-sustainability-due-diligence_en">https://commission.europa.eu/business-economy-euro/doing-business-eu/sustainability-due-diligence-responsible-business/corporate-sustainability-due-diligence_en</a>
Global Reporting Initiative (GRI) Standards 2021	<a href="https://www.globalreporting.org/standards/">https://www.globalreporting.org/standards/</a>
General Data Protection Regulation (GDPR)	<a href="https://gdpr-info.eu/">https://gdpr-info.eu/</a>
Health Insurance Portability and Accountability Act of 1996 (HIPAA)	<a href="https://www.hipaaproject.org/">Health Insurance Portability and Accountability Act of 1996 (HIPAA)   Public Health Law   CDC</a>
Paris Agreement 2015	<a href="https://unfccc.int/process-and-meetings/the-paris-agreement">https://unfccc.int/process-and-meetings/the-paris-agreement</a>



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or contact us at [info@tfscro.com](mailto:info@tfscro.com).