

The title 'TFS Global Code of Ethical Conduct' is displayed in large, bold, white sans-serif font. To the left of the text is a vertical red bar. The background of the entire slide is a photograph of a modern glass-walled building with lush green trees in the foreground and a faint molecular structure overlay in the upper right.

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Introduction

This Code of Conduct outlines the principles and expectations that govern the professional and ethical behavior of all TFS employees, contractors, suppliers/vendors and business partners.

It reinforces our commitment to responsible, ethical and sustainable business practices in line with international standards and the expectations set by our parent company, Ratos AB.

At TFS, we view sustainability and business risk as deeply interconnected. Environmental, social and governance (ESG) considerations are embedded into our daily decisions, risk management processes and long-term strategy. Rather than treating ESG as a standalone topic, we integrate it into the way we operate, ensuring our actions support both responsible conduct and sustainable value creation.



Purpose & Scope

This Code is both a practical resource and guiding framework that:

- Sets clear expectations for ethical and professional behavior and promotes sustainable, responsible business practices throughout our value chain.
- Protects the interests of our people, clinical trial participants, patients, clients, suppliers/vendors, business partners, communities and the environment.
- Ensures that our actions are rooted in integrity, honesty, objectivity, independence, teamwork and due care.
- Fosters a culture of openness, trust, and accountability that strengthens our reputation, long-term success, and delivery to our clients and patients around the world.
- Encourages operational efficiency, effective use of available tools and resources and responsive collaboration with clients and colleagues across functions and geographies.
- Connects to relevant policies, procedures (SOPs) and work instructions (WIs) that support ethical conduct and decision-making.

This Code applies to all TFS employees, contractors, suppliers/vendors and any third party acting on behalf of TFS, globally. It adheres to the principles set out in and has been developed in alignment with or supports compliance with:

 Ratos AB's Code of Conduct	 United Nations Global Compact (UNGC)	 The OECD Guidelines for Multinational Enterprises
 Fundamental conventions of the ILO	 UN Guiding Principles on Business and Human Rights	 Corporate Sustainability Reporting Directive
 SBTi Science Based Targets initiative	 Global Reporting Initiative Standards 2021	 Greenhouse Gas Protocol

Who's Responsible for Living This Code?

TFS operates with independent day-to-day management. Governance and accountability at TFS are shared across multiple roles:

The **TFS Board of Directors** oversees overall organizational governance and strategy, including sustainability and business risk management and ensures compliance with applicable laws, regulations, internal policies and relevant ESG standards. The Board receives regular reporting on material risks, impacts, opportunities and due diligence outcomes.

The **TFS CEO** leads the Executive Committee and oversees the development and implementation of both business and sustainability strategies. Together with the management team, the CEO holds overall responsibility for daily operations and compliance with the Code and reports to the Board on business performance and risk, including ESG targets, risks and opportunities.

The **Executive Committee** is responsible for developing and executing TFS's strategies, driving operational accountability for Code compliance and integrating sustainability across the organization. It oversees material impacts, risk assessments, due diligence processes, policy implementation and sustainability-related reporting.

Managers are accountable for implementing TFS's strategies at the operational level. They promote a culture of ethics, trust, integrity and inclusion within their teams, ensure employee understanding of the Code through training and active support, encourage efficient use of tools, foster collaboration and address potential violations through corrective action when necessary.

Employees and contractors are responsible for executing TFS's strategies by using resources responsibly, engaging constructively with colleagues and clients, contributing to collective success, acting with integrity and reporting suspected breaches or misconduct.

TFS personnel complete Code training and other required training that is proportionate to their role and responsibilities and is refreshed periodically.

Suppliers, vendors, and other partners are required to adhere to the ethical, environmental and social standards outlined in this Code and the **Supplier Code of Conduct**. They are expected to cooperate with audits, assessments and requests for documentation or information related to operations and due diligence practices and to engage with TFS on continuous improvement and risk mitigation when needed.

Living Our Values

This Code is grounded in TFS's core values of trust, quality, flexibility, passion, and sustainability, which guide our behavior and define our culture. Living our values means acting honestly, lawfully, and ethically, even when no one is watching and doing the right thing, every time.

Why this code matters

By following this Code, we uphold a culture of accountability and openness. It helps prevent risks, strengthen stakeholder trust and engagement and support business continuity.

TFS promotes ethical behavior by regularly updating this Code, offering training, raising awareness of key concepts through internal communication and supporting understanding and compliance.

While the Code can't cover every situation, we expect all relevant stakeholders to follow its principles. Violations may lead to consequences in accordance with the disciplinary procedures outlined on [Page 19](#).

What this code means for you

A practical guide to everyday decisions:

- **I act with integrity:** I follow the law, speak up when something feels wrong, and don't cut corners.
- **I treat others with respect:** I create a workplace where everyone feels safe and included.
- **I protect confidentiality:** I handle data and company information responsibly.
- **I avoid conflicts of interest:** I stay objective and transparent in my decisions.
- **I report concerns:** I speak up through proper channels when I see misconduct.
- **I follow policies and procedures:** I use this Code and related documents as a resource.

If you're unsure, ask yourself

- Is it illegal or against company policy?
- Is it unethical or dishonest?
- Could it harm me, a colleague or the company's reputation?
- Would I be embarrassed to read about it in the media?

If the answer is "yes" to any of these, pause. Speak to your Line Manager or consult the Legal team (tfs.legal@tfsco.com) for guidance.



Trust

We build lasting partnerships based on trust, transparency and integrity, ensuring we meet expectations at every step.



Quality

We pursue excellence in all we do, upholding the highest standards, continuously improving and delivering exceptional services and results.



Flexibility

We adapt quickly and thoughtfully to challenges and change, ensuring success throughout the clinical development journey.



Passion

We bring positivity, dedication and commitment to everything we do.



Sustainability

We lead by example, committed to long-term positive impact for people, our planet, and the economy.

Ethical Business Conduct

We operate with the highest ethical standards and a strong system of internal controls. TFS has **zero tolerance for corruption** and requires compliance with applicable anti-bribery, anti-corruption, and fair competition. TFS regularly monitors and evaluates the effectiveness of our governance and ethics practices through internal audits, risk assessments, training, and policy reviews to ensure ongoing compliance and continuous improvement.

Ethical conduct and integrity

- Act honestly, fairly and professionally in all interactions. This includes behavior toward colleagues, clients, authorities, suppliers/vendors, clinical trial participants and patients.
- Comply with international anti-bribery and anti-corruption laws, including the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act and national regulations.
- Never offer, accept, or solicit bribes, kickbacks, lavish gifts, or facilitation payments to influence business decisions or regulatory processes.
 - Only offer or accept modest, customary gifts and hospitality. When in doubt, consult your Line Manager or the Legal team (tfs.legal@tfscro.com). A gift over €50/\$50 or one that could influence business judgment is not acceptable. This applies whether given or received and whether provided directly or cumulatively.
- Avoid conflicts of interest (e.g., close relationships with suppliers/vendors, side jobs or outside employment or personal interests/investments) that could interfere with your role. Any actual or perceived conflicts must be promptly disclosed to your Line Manager or the Legal team (tfs.legal@tfscro.com) upon identification.
- Ensure payments to external parties are for legitimate, clearly documented services and reflect fair market value. Never authorize payments that could be considered fraudulent or unethical. All payments must be supported by written agreements, appropriate approvals and sufficient documentation in accordance with TFS policies.
- We strictly prohibit money laundering and terrorist financing, comply with applicable anti-money laundering laws and regulations and conduct appropriate due diligence to ensure that our services and financial transactions are not used to conceal or legitimize the proceeds of crime. Due diligence is conducted on a risk-based basis and in accordance with applicable internal procedures.

Fair competition and anti-trust

- Compete fairly and comply with all relevant competition and antitrust laws.
- Do not engage in price-fixing, bid rigging or market allocation.
- Never share or solicit commercially sensitive information such as prices, margins, market forecasts or business plans, even informally (e.g., at conferences).
- Select suppliers/vendors based on objective criteria and mutual respect, free from undue influence or favoritism.
- Do not knowingly engage partners involved in internationally prohibited weapons or activities involving severe human rights violations.
- Comply with applicable export control laws and economic sanctions. We do not engage in transactions involving sanctioned parties or restricted goods/services without required approvals and licenses. TFS conducts reasonable screening and due diligence to support compliance with sanctions and export control requirements.

Confidentiality and data privacy

- Protect confidential and personal data, including patient records, financial data, trial results and employee data.
- Maintain confidentiality and data privacy. These obligations continue to apply following termination of employment or engagement with TFS.
- Follow TFS's policy and procedure for data protection when handling personal or confidential information.
- Comply with all applicable privacy and data protection laws, such as the General Data Protection Regulation (GDPR) in Europe and the Health Insurance Portability and Accountability Act (HIPAA) in the United States.
- Mark and handle information appropriately, avoid unencrypted transfers and comply with TFS information security requirements at all times.
- If you use AI tools, you must do so strictly in accordance with TFS policies and only use tools and datasets explicitly approved by TFS. Any suspected or actual data breach, loss or unauthorized disclosure must be reported immediately in accordance with TFS incident reporting procedures.

Insider trading and market conduct

- Do not use or share non-public, price-sensitive information (i.e., information that a reasonable investor would consider important when making an investment decision) to trade securities (insider trading) or to advise others to do so (i.e., recommend trades to others).
 - Examples of inside information include, but are not limited to, major operational risks, unexpected changes in financial performance, legal disputes or acquisitions.
- As part of a listed investment company, we handle potentially price-sensitive information with care, in accordance with applicable market abuse and securities laws, and internal communication protocols.
- Read the **TFS Code Companion** or contact the Legal team (tfs.legal@tfscro.com) if you are unsure about whether information qualifies as inside information.



Social media and communications

Social media plays a pivotal role in our professional and personal lives, serving as a dynamic platform for sharing insights, experiences and engaging in conversations with a wide audience. TFS recognizes the power of social media in shaping perceptions, building our brand and facilitating open communication. Where social media activity has a connection to TFS, its people, clients or industry, these principles apply:

- Use social media responsibly and professionally. Do not disclose confidential information or post any content that could reasonably be expected to harm TFS's reputation or business interests.
- Clearly disclose your affiliation with TFS when posting content or commenting on topics related to TFS or our industry. Disclosure of your affiliation does not mean you are authorized to speak on behalf of TFS, unless explicitly approved.
- Refer to TFS's policy addressing social media for expectations on respectful engagement, confidentiality, and appropriate tone. Employees must not represent that their views are official TFS positions unless formally authorized.
- For any questions regarding social media use or to seek clarification on what constitutes appropriate content, employees are encouraged to consult with the Marketing and Communications team (marketing@tfscro.com).



Political neutrality and legal compliance

- TFS is politically independent and does not use funds to support political candidates or campaigns.
 - Do not use TFS resources for political activities or imply company endorsement.
- TFS does not accept any form of criminal activity or unethical conduct. TFS sets standards of conduct that may go beyond minimum legal requirements. If something is legal, it may still be unacceptable at TFS.
- Always ask yourself whether a behavior aligns with our values and how it would be perceived by others. For example:
 - Alcohol consumption may be legal, but being under the influence at work is not permitted, as addressed in TFS's policy on alcohol and drug use.
 - Even where certain activities may be decriminalized or legal in some jurisdictions, conduct that could expose TFS to reputational, safety or compliance risks is not permitted in connection with work, business travel or assignments.
- When in doubt about the acceptability of any activity or behavior, consult your Line Manager or the Legal team (tfs.legal@tfsco.com).

Responsible use of company assets and resources

- Use company assets (including physical, financial, digital, and information assets) or resources (such as equipment, platforms, computer systems, and funds) for legitimate business purposes only.
- Prevent fraud and misuse, including inflated expenses, unauthorized purchases, or accessing unapproved systems.
- Follow TFS's policy on acceptable use when handling IT systems and digital assets.
- Do not engage in inappropriate, illegal or offensive use of company systems, including access to illegal, offensive or inappropriate content in violation of law or TFS policy.
- Safeguard access credentials and report any loss, misuse or suspicious behavior involving IT resources.



Reporting misconduct and whistleblowing

- Report concerns or any suspected or actual misconduct through your Line Manager, HR, Legal or TFS's **anonymous Whistleblowing Channel** (<https://report.whistleb.com/en/tfs>).
- The Whistleblowing Channel is operated by an external provider and is independent of TFS IT systems, supporting anonymity and confidentiality. All reports will be assessed promptly and handled confidentially to the extent possible.
- TFS strictly prohibits retaliation against anyone who raises concerns in good faith, even if concerns later prove to be unfounded (see [Page 19](#) for more on investigations and disciplinary action).
- Unethical behavior can be addressed through retraining, disciplinary action, or contract termination.
- All managers are responsible for promoting awareness and compliance with these standards.



Respecting People & Human Rights

We respect and promote internationally recognized human rights, labor rights, and the health and well-being of everyone affected by our work, including employees, contractors, suppliers/vendors, sub-suppliers, clients, clinical trial participants and patients. TFS's commitments are guided by internationally recognized frameworks, including the UNGC, UNGPs, the OECD Guidelines and the ILO Conventions. TFS regularly reviews our social responsibility practices across all areas to ensure accountability, relevance and alignment with international standards.

Human rights and labor practices

Our employees are our most valuable resources. TFS's success is achieved only through their hard work, expert knowledge and experience. In the workplace, we:

- Provide a safe, positive and supportive working environment characterized by mutual respect and good mental, social and physical conditions for all employees.
- Respect freedom of association and uphold the right to collective bargaining, in accordance with applicable law.
- Support open and constructive social dialogue.
- Avoid all forms of discrimination and harassment.
- Offer fair and equal treatment and working conditions, meeting or exceeding the minimum requirements as stipulated in national law and/or collective agreements, as well as relevant national/international regulations or guidelines.
- Always practice diversity and inclusion, including during hiring practices.
- Pay fair salaries and remuneration in accordance with local laws/norms.

Additionally:

- Remuneration and incentive programs are managed in line with applicable group-level governance principles and local requirements, ensuring fairness, transparency and compliance with applicable laws. TFS currently does not integrate sustainability performance into incentive schemes. Remuneration and incentive programs are managed in line with applicable group-level governance principles and local requirements, ensuring fairness, transparency and compliance with applicable laws.
- TFS prohibits all forms of child labor, forced labor, and modern slavery, both in our operations and across our supply chain. We do not employ anyone under the age of 15 or any applicable higher statutory minimum age, under applicable law. Our recruitment procedures include verifiable age verification mechanisms.
- Employment contracts must clearly state terms and conditions, the voluntary nature of employment and the right to freely terminate employment. Our business partners must not charge recruitment fees or withhold identity documents.
- We exercise due diligence on suppliers/vendors and partners globally to uphold these standards and monitor our supply chains.
 - If a supplier/vendor operates in a high-risk country for labor exploitation, they may be subject to targeted audits (or other proportionate measures), improvement plans or escalation procedures, in line with our Supplier Code of Conduct.
- We engage with our suppliers to assess and address actual and potential human rights impacts and where gaps are identified, co-create improvement plans or take other appropriate measures.

Diversity, equity, inclusion

TFS values difference and inclusion as a source of strength. TFS is a positive, non-discriminatory workplace in which people are the most important asset.

- We foster a work environment that is free from prejudice, bias and unfair treatment. Individuals are evaluated based on merit and the inherent requirements of their jobs, including their skills, qualifications and abilities, not characteristics such as race, ethnicity, gender, age, disability, religion or sexual orientation.
- TFS provides equal opportunity in recruitment, development and advancement. Managers are expected to monitor for bias and promote inclusive practices within teams.
- Employees may always report any type of harassment or unacceptable behavior to their Line Manager and/or a Local HR Representative or through our Whistleblowing system (WhistleB available via: <https://report.whistleb.com/en/tfs>).
- TFS strictly prohibits retaliation against anyone who raises a concern in good faith.

Health, safety, and well-being

TFS is committed to a safe and secure working environment for all employees, consultants and visitors. We support physical, mental and emotional health through policies, tools and workplace culture.

- Employees must follow health and safety procedures relevant to their location and role.
- Hazards or well-being concerns should be reported without delay to their managers.
- TFS acknowledges the important impact mental health has on our daily lives and provides employees with free access to tools, training and exercises to support mental well-being anywhere, anytime.
- Employees must comply with local safety and environmental regulations and instructions from local health authorities.
- TFS aligns our safety approach with the guidance of the World Health Organization and local public health authorities.

Employee development, training, and career management

- TFS supports employee growth through structured onboarding, mandatory Code of Conduct training and ongoing development opportunities.
- Performance reviews include regular feedback dialogues and career planning to help employees build skills and grow within the company.
- Employees have access to leadership development, skills training and digital learning platforms.

Engagement with communities and other stakeholders

Beyond the workplace, TFS contributes to our global mission of improving health and well-being. We actively partner with community organizations, non-profits and public health actors to create shared value.

- Our clinical trials prioritize clinical trial participant and patient safety, dignity, and informed consent, in accordance with applicable laws, regulations and ethical standards.
- TFS's potential to impact human rights extends beyond how we treat our employees; it encompasses how we conduct clinical trials and the third parties we work with.
- Stakeholder voices are considered in business and sustainability planning, materiality assessments and human rights due diligence activities.
- TFS provides grievance mechanisms, including anonymous reporting channels, not only for employees, contractors and suppliers but also for other and external stakeholders, including clinical trial participants, patients, and community members, to raise concerns related to labor rights, human rights, ethical conduct, or workplace conditions.

- TFS engages with community organizations and non-profits in a responsible, transparent, and ethical manner, partnering only with non-political initiatives aligned with our values and ensuring engagements are appropriately reviewed, approved in accordance with internal policies, documented, and monitored.



Protecting the Environment

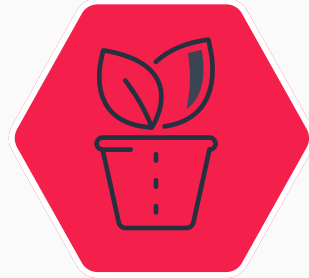
TFS is committed to minimizing our environmental footprint and helping accelerate a low-carbon, sustainable future for healthcare and clinical research. Environmental stewardship is key to developing our business sustainably. All TFS stakeholders are expected, within their roles and responsibilities, to contribute to reducing environmental impact.

Environmental principles

- Our policy addressing environmental stewardship and climate action details our commitment to advancing environmental sustainability and climate resilience across our global operations and value chain.
- TFS applies the precautionary principle in environmental decision-making, especially when risks are unclear or data is evolving. This includes choices related to procurement, office operations and business travel.
- We operate an internal environmental management system and utilize carbon accounting, reporting platforms and sustainability consultants to monitor performance, identify risks, and guide continuous improvement.
- Environmental responsibility is integrated into how we design and deliver clinical trials, ensuring we reduce environmental harm while upholding patient safety, data integrity, and regulatory compliance.
- We promote awareness, responsibility and alignment with our environmental principles across all departments and among suppliers and vendors.

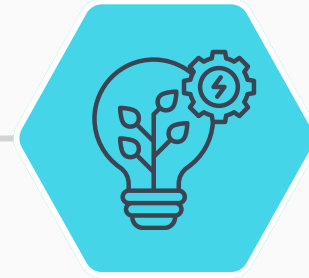
Climate action and emissions

- We measure and reduce our greenhouse gas emissions in line with the latest climate science and publicly disclose our Scope 1-3 emissions and performance through our annual Sustainability Report and via external third-party evaluators such as **CDP** and **EcoVadis**.
- We are committed to the **SBTi** and have **approved near-term and net-zero emission reduction targets**.
- We actively pursue energy-efficient and low-emission solutions where relevant and encourage suppliers/vendors (where feasible) to measure and reduce emissions in line with a 1.5°C pathway.
- We assess climate-related impacts, risks, and opportunities through an annual update of our double materiality assessment and integrate adaptation strategies into operations to ensure business continuity and stakeholder confidence in a changing climate.
- TFS recognizes that environmental risks, including those related to climate change, may impact service delivery and stakeholder expectations. We communicate these risks and mitigation efforts to internal and external stakeholders (as applicable).



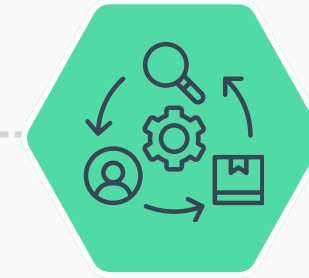
Resource efficiency and waste

- We strive to reduce our use of energy, paper, and other resources through operational efficiencies.
- We promote digital-first solutions (e.g., e-signatures, digital communication platforms) and avoid single-use items like plastic, where feasible.
- We follow local waste management regulations. Waste is segregated and disposed of responsibly, with particular attention to e-waste and hazardous materials in applicable contexts.
- We pursue energy-saving initiatives across our operations and facilities.



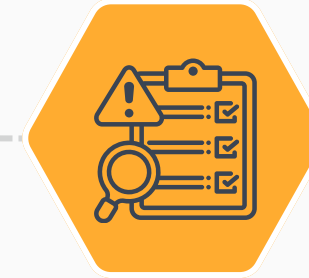
Technology and innovation

- We encourage the adoption of eco-efficient technologies to reduce climate impact, improve cost-efficiency and mitigate risks, including:
 - E-signatures and digital trial platforms (e.g., electronic data capture systems) to reduce paper use.
 - Virtual meetings and platforms to minimize travel.
 - “Green fleet” of low-emission company cars.
 - Decentralized and hybrid trial models.
- We continuously identify and implement environmentally responsible innovations across the business (guided by our policy addressing sustainable procurement).



Supply chain engagement

- Environmental expectations are embedded in our Supplier Code of Conduct.
- We evaluate vendors/suppliers based on environmental performance and risks and we request supporting documentation on practices and policies (as applicable).
- Where gaps are identified, we work with suppliers/sub-suppliers to co-create improvement plans or take corrective actions.



Monitoring and continuous improvement

- TFS regularly assesses environmental performance using internal reviews, environmental KPIs and third-party platforms. Findings inform target-setting, strategy refinement and external reporting. We strive for continuous improvement and seek recognition from leading frameworks, such as CDP, EcoVadis, and SBTi.
- Oversight of environmental initiatives is provided by the Executive Committee, with implementation responsibilities shared across functions, including Sustainability, HR, Vendor Management, IT, Facilities, Marketing and our Business Units.

Breaches and Disciplinary Action

TFS takes any breach of this Code seriously. Violations—whether intentional or unintentional—undermine our shared values, compromise trust and may pose legal, ethical or reputational risks. All employees, contractors, and business partners are expected to act with integrity and comply with this Code, along with applicable laws, company policies and procedures. Violations may result in corrective or disciplinary action (proportionate to the nature and severity of the violation and subject to applicable law), including but not limited to: 1) coaching or retraining, 2) formal warnings, 3) suspension, 4) termination of employment or contracts and 5) referral to relevant regulatory or legal authorities in serious cases

- TFS will always ensure that reported concerns are handled fairly, confidentially and with due process. Investigations will be carried out impartially and consistently, respecting the rights of all individuals involved. Knowingly making false allegations or reports in bad faith is itself a violation of this Code and may result in disciplinary action. Reports made in good faith will not result in adverse consequences, even if they are ultimately unsubstantiated.
- Reporting suspected misconduct is a shared responsibility. Concerns may be raised through your Line Manager, Legal, HR or the anonymous Whistleblowing Channel (<https://report.whistleb.com/en/tfs>) as soon as reasonably possible. For details, see [Reporting Misconduct and Whistleblowing](#).
- Investigations are conducted fairly, confidentially and with due process. Reasonable judgment must be exercised to avoid baseless accusations.
- TFS leadership, including managers, is expected to lead by example. Line Managers should promote awareness of the Code and address potential violations appropriately and consistently.

Our goal is not only to correct misconduct but to foster a culture of trust, accountability and continuous improvement.

Oversight and Implementation

This Code is reviewed annually to reflect current laws, stakeholder expectations, and international standards. Oversight includes implementation support, regular updates, and training coordination. Updates may be made more frequently if needed due to regulatory changes, feedback, or emerging risks relevant to our industry. All employees and contractors are required to complete Code training and confirm their understanding and commitment during onboarding and at periodic refreshers; they are also expected to stay informed and uphold the Code in their daily conduct. The Executive Committee is overall responsible for implementation, training and continuous improvement, supported by relevant functions.



Resources

The following resources provide further context on the international standards and regulations referenced in this Code (click below to learn more):

- [The United Nations Global Compact \(10 Principles\)](#)
- [The UN Guiding Principles on Business and Human Rights \(UNGPs\)](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [UN Universal Declaration of Human rights](#)
- [UK Modern Slavery Act](#)
- [International Labour Organization \(ILO\) Conventions](#)
- [EU Corporate Sustainability Reporting Directive \(CSRD\) and relevant European Sustainability Reporting Standards \(ESRS\)](#)
- [Global Reporting Initiative \(GRI\) Standards 2021](#)
- [General Data Protection Regulation \(GDPR\)](#)
- [Health Insurance Portability and Accountability Act of 1996 \(HIPAA\)](#)
- [Paris Agreement 2015](#)



This Code is supported by TFS's policy framework, which sets out the principles and requirements for ethical conduct, compliance and responsible business practices across the organization and our value chain. These include, among others:

- Corporate governance, ethics, legal compliance, and accountability policies
- Training and competency
- Data protection and information security
- Supplier Code of Conduct and management requirements

Additional guidance, procedures (SOPs), and work instructions are available through TFS's internal policy library or may be provided by TFS upon request, as appropriate.

TFS Code Companion

This appendix provides further explanation of key concepts, terms, and examples referenced in the Code. It is intended as a practical resource for employees, contractors and partners seeking deeper clarity or guidance.

What is modern slavery?

Modern slavery refers to the exploitation and coercion of individuals for various forms of labor or services, often under conditions that violate their basic human rights and dignity. It includes the recruitment, harboring or transportation of people against their will and without adequate compensation or protection.

Key characteristics include:

- Forced labor
- Human trafficking
- Child labor
- Exploitative or unsafe working conditions
- Debt bondage

Signs to look out for:

- Confiscation of identity papers or passports
- Withholding of wages
- Lack of official employment status or unclear contract terms
- Abusive working environments
- Physical or sexual violence
- Recruitment fees paid by the worker to secure a job
- Restrictions on movement or communication

What is a bribe?

A bribe is any gift, payment, favor or benefit offered or received with the intent to improperly influence business decisions or gain an unfair advantage. Bribery undermines fair competition and violates national and international laws.

Examples include:

- Cash, expensive gifts, or lavish entertainment given in exchange for business
- Offering benefits to public officials to expedite approvals
- Providing personal favors or employment to relatives of decision-makers

External parties include:

- Clients, vendors, suppliers, healthcare providers, public officials, regulators and any other entity or individual interacting with TFS

What is a conflict of interest?

A conflict of interest occurs when personal interests, relationships or outside activities interfere with a person's ability to make impartial business decisions on behalf of TFS.

Examples include:

- Hiring or supervising a family member
- Holding financial interest in a competitor or supplier
- Receiving personal benefits from a business decision involving TFS

How to assess:

- Will I or a close relative gain personally?
- Could this activity affect my judgment at work?
- Could others perceive this as biased or inappropriate?

If in doubt, disclose the situation to your Line Manager or the Legal team (tfs.legal@tfsagro.com).

What is intellectual property (IP)?

IP includes trade secrets, patents, inventions, research data, know-how, methodologies, software, confidential business information, and any other proprietary or non-public information owned by or licensed to TFS. Protecting IP is essential to maintaining our competitive position, meeting contractual obligations and safeguarding innovation.

To protect IP, you must:

- Not disclose or share confidential or proprietary materials without proper authorization
- Clearly mark information appropriately (e.g., confidential, proprietary) and restrict access to those with a legitimate business need
- Follow TFS policies and procedures when creating, storing, accessing, transmitting, or disposing of sensitive or proprietary information
- Use approved systems and secure methods for handling IP and confidential data

Unauthorized use, disclosure, or misuse of IP may result in disciplinary action and, where applicable, legal consequences.

What is commercially sensitive information?

Commercially sensitive information is confidential business information that, if disclosed, could harm TFS or provide an unfair advantage to competitors, customers or other third parties. This type of information must be protected at all times and shared only on a strict need-to-know basis.

Examples include:

- Pricing strategies, discounts, cost structures and profit margins
- Market forecasts, strategic plans, and business development initiatives
- Contract terms, bids, tenders and negotiation positions
- Customer, supplier, or investigator lists and related contact details

Commercially sensitive information must never be shared externally or with unauthorized individuals and must not be discussed in informal settings (such as conferences or social media). Misuse or unauthorized disclosure may result in disciplinary and legal consequences.

What is personal data and data privacy?

Personal data is any information that can directly or indirectly identify an individual (e.g., name, contact details, health records). TFS complies with GDPR and other applicable data privacy and data protection laws.

You must:

- Collect and use personal data lawfully, fairly and transparently, and only for legitimate business purposes
- Share personal data only with authorized individuals and through approved channels
- Ensure personal data is accurate, kept up to date and stored securely
- Immediately report any actual or suspected data breach in accordance with TFS policies and procedures

What is inside information?

Inside information is material, non-public information that, if made public, would likely influence the price of a company's shares or other securities. Using or disclosing inside information for financial gain is called insider trading and is illegal.

Examples include:

- Unannounced mergers, acquisitions or divestitures
- Unexpected financial results or operational risks
- Significant legal disputes or investigations

Never share, trade or act on such information. Contact the Legal team (tfs.legal@tfsagro.com) for guidance.

What is political activity in the workplace?

Political activity includes participation in campaigns, lobbying, political donations or endorsements. Personal political participation must be kept separate from company activities.

TFS employees must not:

- Use company resources for political activities
- Represent personal views as company views
- Solicit political contributions in the workplace

What is a validated GxP system?

GxP systems (Good Practice quality guidelines) are computerized systems used in regulated processes such as clinical trials. Validation ensures these systems are reliable, secure and fit for their intended purpose.

TFS requires that:

- All GxP systems (internal or vendor-provided) are properly validated
- Systems are maintained in a compliant state and ready for inspection



For more information, please visit tfscro.com or contact us at info@tfscro.com.