



Symeres

Making Molecules Matter. Together.

SUPPLIER CODE OF CONDUCT





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1. INTRODUCTION

At Symeres, our tagline “*Making Molecules Matter. Together*” embodies more than our dedication to scientific innovation. It reflects our commitment to creating a positive and lasting impact on the world.

Furthermore, we recognize that sustainable and responsible business practices are essential to our long-term success and our business partners are playing a vital role in this.

This Supplier Code of Conduct is aligned with the United Nations Guiding Principles on Business and Human Rights and the International Labor Organization (ILO) ‘Declaration on Fundamental Principles and Rights for Work’.

We require suppliers to meet the minimum standards outlined in this code of conduct and to maintain full compliance with all applicable laws and collective bargaining agreements. Suppliers are expected to avoid conditions or incidents that might result in a violation of law. This code applies to all suppliers, (sub)contractors, service providers, contract manufacturers, agents, *etc.*, further referred to in this policy as ‘suppliers’.

Symeres may verify supplier compliance with this code of conduct using self-assessment questionnaires, documented evidence reviews and/or on-site or remote audits. Symeres reserves the right to take appropriate measures against suppliers that do not meet the requirements laid out in this document including the suspension or termination of the supplier relationship and/or supply contract.

Symeres reserves the right to change or update this Supplier Code of Conduct. If Symeres changes this Supplier Code of Conduct, suppliers shall immediately accept and sign the amended version of this Supplier Code of Conduct, unless suppliers have motivated and valid reasons not to agree to the amendment.



2. HUMAN RIGHTS AND LABOR

Human rights are fundamental rights and freedoms that all people are entitled to, without regard to race, color, national origin, religion, gender, age, marital status, physical or mental disability, citizenship status, gender identity and expression, or sexual orientation.

Symeres expects suppliers to be committed to respecting the human rights of internal and external stakeholders and ensuring to treat them with respect and dignity. Suppliers are required to comply with local laws governing employment relationships.

2.1. Child labor and young workers

Suppliers shall not use child labor. The minimum working age shall be 15 or the country's legal age for employment, whichever is higher. Young workers below the age of 18 will only perform non-hazardous work (so no chemical or biological handling, no strenuous physical or forced labor, *etc.*). Suppliers must verify the age of workers before employment commences. All applicable local laws should be followed, including access to education, training, health checks and the number of hours allowed to work, *etc.*

2.2. Free chosen employment

All forms of forced labor, prison labor, human trafficking or any form of modern slavery are prohibited. Foreign migrant labor must be recruited responsibly and according to law. No employee shall pay for a job or be denied freedom of movement. They should be able to leave or end their employment at any time after a reasonable notice period. Employees shall be paid on time and paid in full for the work they have done prior to leaving.

2.3. Fair treatment and non-discrimination

Suppliers shall provide a working climate free from illegal discrimination and harassment, including discrimination and harassment based on race, gender, color, religion, sex, age, national origin, mental or physical disability, ancestry, marital status, pregnancy, sexual orientation, childbirth, or related medical condition, or any other legally protected classification. Adequate policies and procedures should be in place to report incidents of discrimination or any unfair employment practice.

2.4. Freedom of association

Suppliers shall respect the rights of employees, as set forth in local laws, allow employees to seek representation, join works councils, join a union and collective bargaining. Employees should be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

2.5. Wages, benefits and working hours

Working hours must be adhered to in accordance with local laws or industry benchmarks. Employees must be paid the minimum wage for each relevant country and region. Overtime should be voluntary, and employees will not have to work more than 48 hours a week on a regular basis, or 60 hours a week including overtime. Employees are given time off and breaks in accordance with local laws.



3. HEALTH, SAFETY AND WELLBEING

Symeres is committed to promoting the protection of the health and safety of all workers in its supply chain and continuously strives to improve health and safety practices. Symeres expects suppliers to uphold the highest standards in protecting the health, safety and wellbeing of their employees, visitors and others who may be affected by their activities.

3.1. Health and safety protection

Suppliers must ensure that workers are provided with a healthy and safety working environment in compliance with applicable laws and regulations. Suppliers are also required to operate and maintain their buildings, operations, procedures and equipment safely.

3.2. Hazard information and training

Safety information regarding hazards must be readily available to inform employees. The hazards may include but are not limited to those related to raw materials, isolated intermediates, (final) products, solvents, cleaning agents, and waste. Suppliers should ensure that all employees receive adequate training to maintain health and safety standards. Additionally, suppliers should conduct health and safety risk assessments to implement measures to mitigate risks to an acceptable level.



4. ENVIRONMENT

Symeres is committed to minimizing the negative environmental and social impact of its supply chain. Suppliers should operate in an environmentally responsible and efficient manner to minimize adverse impact on the environment and help their own suppliers to do the same. Suppliers shall comply with all applicable environmental laws and regulations and are encouraged to conserve natural resources, reduce greenhouse gas (GHG) emissions and waste, preserve biodiversity and clean water, and minimize and control the use of hazardous materials.

4.1. Environmental authorizations and reporting

Our suppliers are responsible for protecting the environment in which they operate and must comply with all relevant environmental permits, registrations, and licenses. They are expected to be aware of the potential environmental impacts, responsibilities, and risks. Suppliers should strive to minimize their impact through continuous improvement and the development of sustainable business practices.

4.2. Waste and emission

Suppliers should strive to use water resources efficiently and implement measures to reduce water consumption and pollution. They should reduce and recycle waste materials wherever possible and ensure safe and responsible disposal of non-recyclable waste.

4.3. Spill and release

Suppliers should implement a system to prevent and mitigate accidental spills and releases into the environment, as well as any associated adverse impacts on the local community.

4.4. Climate change

Suppliers shall strive to minimize their energy consumption and improve energy efficiency across all their operations. Symeres expects suppliers to be committed to reducing their GHG emissions through sustainable practices, including the use of renewable energy sources.

4.5. Resource efficiency

Suppliers should take measures to improve their resource efficiency. They should strive for a circular business model by reducing resource, water, and energy consumption, and prioritizing reuse and recycling.

4.6. Biodiversity conservation

Suppliers should aim to lessen their impact on biodiversity by reducing and mitigating their carbon footprint whenever possible.



5. ETHICS

We expect our suppliers to conduct their business with the highest level of integrity and transparency, adhering to ethical standards and legal requirements. We have a zero-tolerance policy towards bribery and corruption and implement measures to prevent and detect any form of unethical behavior.

5.1. Anti-corruption and anti-bribery practices

Suppliers must comply with global anti-trust and competition laws. They must not give or accept bribes or other improper benefits to obtain business or gain an unfair advantage. Additionally, they must not enter into agreements with competitors to fix prices or wages, rig bids, or allocate customers, workers, or markets.

5.2. Fair competition

Suppliers shall conduct their business consistently with fair and vigorous competition, in compliance with all applicable anti-trust laws, and respecting intellectual property rights and confidentiality. Suppliers should employ fair business practices including accurate and truthful advertising.

5.3. Animal welfare

Animals must be treated humanely, with efforts made to minimize pain and stress. Animal testing should only be conducted after considering alternatives to replace animals, reduce the number of animals used, or refine procedures to minimize distress. Alternatives should be used wherever they are scientifically valid and acceptable to regulators.

5.4. Conflicts of interest

A conflict of interest may arise if an employee engages in activities or transactions, or advances personal interests, at the expense of the business interests. Such conflicts of interest can be personal or professional in nature. Suppliers are responsible for avoiding situations in which the employee's loyalty may become divided and are expected to notify all affected parties if an actual or potential conflict of interest arises.

5.5. Product protection and quality

Suppliers shall ensure that management and security systems protect products, components, and ingredients from the risks of adulteration, falsification, or theft for the purpose of illegal resale.

5.6. Data privacy and security

Suppliers shall safeguard and make only proper use of confidential information to ensure that company and employee privacy rights are protected. Suppliers shall comply with applicable privacy and data protection laws and ensure the protection, security, and lawful use of personal data.

Symeres follows the 'General Data Protection Regulation' (GDPR) for personal data protection and expects suppliers to do the same.



6. GOVERNANCE AND MANAGEMENT SYSTEMS

Suppliers shall use appropriate systems to assess risks and impact, monitor legislation, set priorities, assign responsibilities, adopt risk-mitigation measures, and facilitate continuous improvement and compliance. Symeres encourages suppliers to report on Environmental, Social & Governance (ESG) topics, *e.g.* in a Sustainability Report and/or *via* platforms such as Ecovadis and CDP (Carbon Disclosure Project).

6.1. Commitment and accountability

Suppliers shall demonstrate commitment to the concepts described in this document by allocating appropriate resources and identifying senior responsible personnel, thereby creating a culture of responsible practices.

6.2. Legal and customer requirements

Suppliers shall comply with all the applicable laws, regulations, codes, standards, collective bargaining agreements and Symeres' requirements laid out in this code.

6.3. Risk management

Suppliers shall have mechanisms in place to determine and manage risks in all areas addressed in this code.

6.4. Traceability and control

Suppliers shall have systems in place to carry out due diligence on their own supply chain, including traceability for the sources of raw materials to support legal and sustainable sourcing.

6.5. Training and competency

Suppliers shall provide a training program which gives management and workers an appropriate level of knowledge, skills and abilities to meet expectations.

6.6. Documentation

Suppliers shall maintain accurate and verifiable records and documentation necessary to demonstrate conformance with this code of conduct and compliance with applicable regulations.

6.7. Continuous improvement

Suppliers are expected to take necessary actions to identify and correct deficiencies by internal or external assessments, inspections, and management reviews. Suppliers are expected to record and report near-misses, incidents, and incident prevention opportunities.

6.8. Grievance mechanisms

Internal and external shareholders should be able to address any concerns related to the scope of this Supplier Code *via* a grievance mechanism. Reporting of concern should be possible in a safe and confidential manner, without retaliation or threat of retaliation.

6.9. Response and remediation

Suppliers shall properly investigate incidents or concerns relating to this code, take necessary corrective actions, and provide remediation where required.



6.10. Effective communication

Suppliers shall have effective systems to communicate this code to relevant stakeholders including their workers, (sub)contractors, and suppliers.

6.11. Trade sanctions and exports control

Suppliers shall identify and comply with applicable trade sanctions and export control laws including but not limited to US and EU sanction laws.



7. INFORMATION SECURITY

Suppliers shall assess information security risks and take appropriate measures to protect confidentiality, integrity and availability of information. Symeres encourages suppliers to pursue relevant information security certifications and third-party validations, such as the ISO 27001 and CyberVadis.

7.1. Compliance with laws and regulations

Suppliers shall comply with relevant data protection and privacy laws (*e.g.*, GDPR, CCPA, HIPAA) that apply to the data they handle.

7.2. Non-disclosure agreements

Suppliers shall agree to confidentiality and non-disclosure agreements (NDAs) to prevent unauthorized disclosure of sensitive information of Symeres.

7.3. Data handling

Suppliers must ensure the proper handling, storage, and destruction of sensitive data, including personal information, financial data, and intellectual property.

7.4. Data transfer

Suppliers must implement secure methods for data transfer, ensuring encryption during transmission.

7.5. User access management

Suppliers shall ensure that only authorized personnel have access to sensitive systems and data based on their role (least privilege principle).

7.6. Notification of breaches

Suppliers shall notify Symeres of any security incidents involving sensitive data within 72 hours.

7.7. Protection of intellectual property

Suppliers shall ensure the protection of Symeres' intellectual property.

7.8. Business continuity and incident management

Suppliers shall have business continuity planning and incident management implemented to mitigate disruptions to the provision of services.