



SUPPLIER CODE OF CONDUCT

(last modified 26 June 2024)

At Neurotech Pharmaceuticals, Inc. (Neurotech), we are committed to developing and commercializing products to improve patient care and outcomes. We believe that conducting our business by sustaining the environment, supporting our local communities, embracing diversity and inclusion, and adhering to a strong culture of compliance and ethics will positively impact our employees, stakeholders, community and the environment. In turn, we expect the same from our suppliers and will select and engage with those third-party business partners who share our commitment.

Applicability

This Code applies to all of our suppliers, vendors, contractors, consultants, and agents, whether they are individuals, organizations or companies (Suppliers).

Our Expectations of Suppliers

Suppliers shall always conduct their business in an ethical manner and act with integrity.

- Instill a culture of adherence to compliance and safety in all aspects of your business including all applicable international, country/federal/national, state/provincial, and local laws, regulations, industry codes, standards and government agency requirements.
- Ensure a strict zero-tolerance policy regarding the acceptance or offering of bribes or other forms of corruption, including any actions that could be construed as bribes, meant to influence business decisions. This includes gifts, money, hospitality, grants, scholarships, service arrangements, or other forms of payment/incentive, whether provided directly or indirectly, that could be seen as an attempt to compromise or improperly influence a business decision for their own organization or Neurotech.
- Openly and willingly comply with Neurotech' risk assessment and qualification processes which may occur prior to and throughout our business relationship. This may include on-site audits, including quality audits, to assess and verify that you can meet our specific product or service requirements (which may include review of control systems, quality plans, specific capabilities, operating policies and supporting documentation).



- Comply with applicable laws and contractual requirements regarding the storage, transmission, protection, disclosure and use of confidential information, which may include personal data about any individuals and our confidential information, intellectual property rights and our innovative ideas.
- Conduct your business consistent with fair and vigorous competition and in compliance with all antitrust laws. Employ fair business practices that include accurate, transparent, and truthful advertising and pricing.
- Comply with all applicable trade regulations, including licensing requirements, embargoes, and/or other trade restrictions that have been approved by national and international authorities.
- Be familiar with, and fully comply with, all applicable Neurotech policies, procedures and guidance. If unsure, then proactively inquire.
- Ensure that Neurotech is notified of the use of all subcontractors providing goods and/or performing services on our behalf. Where contractually obligated, confirm Neurotech approval of such use prior to any engagement.
- Promptly report any actual or suspected violations of the law, regulations, or Neurotech policies and procedures to Neurotech as soon as identified.
- Disclose any sanction, exclusion or other event that would make you ineligible from participating in any government-funded program or contract.

Fair Treatment, Human Rights & Labor

Suppliers are expected to treat their employees with dignity and respect and adhere to the following:

- Prohibit discrimination for reasons such as gender, race, disability, ethnicity, nationality, religion, sexual orientation, or gender identity or expression.
- Treat your people fairly, equally and with respect. Do not tolerate abuse or harsh treatment of any kind including sexual harassment, sexual abuse, mental or physical coercion, or verbal abuse, including the threat of such treatment.
- Embrace diversity. Ensure your human resource practices reflect efforts to increase diversity within the workplace.



- Do not engage in any forms of indentured or forced labor, slavery or servitude, human trafficking or compulsory or involuntary prison labor. Employees should be free to leave their employer at their own discretion.
- Ensure that child labor is strictly prohibited. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment, or the age established for completing compulsory education.
- Allow employees to freely communicate with their supervisors regarding their working conditions, compensation, or voice other concerns without the fear of retribution, intimidation, termination, or harassment. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely.

Health, Safety, & the Environment

Suppliers shall provide a safe and healthy work environment. Additionally, suppliers shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment.

- Operate your business in a proactive, environmentally responsible manner that is intended to protect the health and safety of all employees.
- Have a written and active environmental health & safety (EHS) program, including training programs, and ensure its implementation. This includes integrating environmental sustainability practices into your business activities and plans as well as defining emergency response plans for employees.
- Suppliers whose operations include handling and/or working with hazardous materials, chemicals, or other potentially harmful products must ensure that employees are properly trained, and that safety information material related to such products and their potential risks are readily available for affected employees. In addition, suppliers shall have programs in place to prevent or mitigate accidental and/or catastrophic release of hazardous materials and chemicals into the environment.
- Ensure all emissions to air, water, and land are in compliance with all laws and regulations. Proper management of all effluents, emissions, and solid waste are to be documented in an EHS Plan.



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- Encourage the conservation of energy and natural resources, avoid the use of hazardous materials where possible, and engage in activities that reuse and recycle materials.
- Exercise responsible sourcing in your supply chain, acting in reasonable and practical accordance with the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (<http://www.oecd.org/corporate/mne/mining.htm>).

Confidentiality and Data Privacy

Suppliers shall treat the data of Neurotech and its employees with correct level of security measures.

- Comply with all regulations related to data privacy. Only use Neurotech confidential information and personal data as necessary to provide services to Neurotech and consistent with your agreement with us. Only share such information and data with third parties, such as subcontractors, as part of providing your services or at our direction. Similarly, you should not share any third-party data with Neurotech which has not been expressly permitted by that party or is not already in the public domain. If you accidentally use or share information or data for any other purpose than what is permitted under our agreement, you must report this to Neurotech's legal department immediately.
- Ensure effective organizational and security measures are implemented to safeguard all such confidential information and all such personal data covered under data privacy rules and regulations including any subcontractors. Any security incident involving a system that houses our personal data must be reported to Neurotech's legal department immediately.
- All employees who have access to Neurotech confidential information or personal data must be appropriately trained to ensure the protection of this information and data. Also, access to such information and data must be limited to only those with a direct need to know to perform their job on behalf of Neurotech.
- When confidential information or personal data is no longer necessary for doing business with Neurotech, you agree to proactively contact Neurotech's legal department immediately to determine whether to return such information and/or data or to certify to its destruction.



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Management Systems

Suppliers are expected to implement management systems to facilitate compliance with applicable laws and the principles of this Supplier Code of Conduct.

- Implement methods to identify and manage risks in the areas addressed in this document and applicable legal requirements. Additionally implement a business continuity plan to ensure that business operations will continue with minimal disruption in the event of a disaster or similar unforeseen event which has the potential to compromise supplier's business operations.
- Conduct periodic self-evaluations to verify compliance with applicable laws and regulations and the principles set forth in this document. Suppliers will have a process for timely correction of any deficiencies identified by an internal or external audit, assessment, or inspection. Suppliers will identify preventative action and a process to evaluate the effectiveness of the corrective action taken.
- Maintain adequate documentation to demonstrate compliance with applicable legal requirements and the principles in this document.
- Communicate the principles of this document to their supply chain and periodically evaluate their supply chain's compliance with applicable laws and principles within this document.

Raising Concerns

Employees of Suppliers should begin by contacting their own company to resolve internal ethics and compliance concerns.

Neurotech is committed to conducting its business on a daily basis consistent with the highest standards of ethical conduct, fairness, integrity and respect for the law and its corporate values. Neurotech maintains a third- party confidential reporting system for the receipt, retention and treatment of complaints regarding Neurotech' accounting, internal accounting controls, auditing matters, policy, safety, human resource matters, violation (or possible violation) of laws and other compliance concerns. You may report a problem or concern by making a report via Neurotech's web-based reporting tool at ethicspoint@neurotechusa.com or by calling Neurotech's Compliance Concern Hotline at +1-401-495-2410. Calls and submissions are anonymous (unless the caller self-identifies) and will be directed to the appropriate individuals at Neurotech.