Seegene

Seegene Supplier Code of Conduct

Department in charge	Legal Affairs Department
Established	June 5, 2020

The Seegene Supplier Code of Conduct outlines Seegene's fundamental expectations regarding labor, human rights, health and safety, environmental protection, supply chain responsibility, compliance with applicable laws (including anti-corruption and anti-bribery laws), and ethical business conduct. This Code applies to all Seegene suppliers, including their subsidiaries, subcontractors, manufacturers, and all of their agents. Suppliers are responsible for communicating this Code to all individuals performing work for or on behalf of Seegene. (For the purposes of this Code, "Supplier" refers to any third-party providing products or services to Seegene.)

All suppliers must understand and comply with this Code. Seegene may reasonably evaluate suppliers' compliance, and suppliers are expected to take all necessary steps to observe and uphold this Code. Suppliers must also cooperate with any reasonable requests made by Seegene to verify their adherence.

- Establish and maintain an internal Code of Ethics or compliance program reflecting local and international regulations and provide regular compliance training for employees
- Communicate this Code to all employees and dispatched workers
- Promptly report any violations of applicable laws or ethical standards to Seegene and cooperate in identifying corrective measures

1. Human Rights and Labor Practices

Seegene respects internationally recognized human rights initiatives, including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organization (ILO) Core Conventions. Suppliers are required to comply with all relevant labor laws and standards.

- Prohibit the employment of underage workers and ensure compliance with minimum working age
- Forbid all forms of forced or exploitative labor, and provide workers with a written employment contract in their native language that clearly defines the terms and conditions of employment
- Prohibit discrimination in hiring, promotion, compensation, access to training, or any employment practice on the basis of race, color, age, gender, gender identity, national origin, disability, pregnancy, religion, political affiliation, union membership, or marital status
- Treat all workers with dignity and respect; maintain a workplace free from sexual harassment, abuse, corporal punishment, mental or physical coercion, verbal abuse, or any other form of inhumane treatment or intimidation
- Fully comply with laws on maximum working hours and days, minimum wages, benefits, and compensation
- Respect the legal right to freedom of association and collective bargaining, and ensure employees can communicate concerns with management without fear of retaliation, discrimination, or harassment

2. Health and Safety

Seegene complies with applicable laws and regulations to provide a safe and hygienic workplace. Suppliers are likewise expected to comply with relevant health and safety laws and standards.

- Identify and control potential hazards through preventive measures, maintenance programs, safe work procedures, and training

- Provide employees with access to safety data sheets and chemical hazard information
- Ensure the provision of appropriate personal protective equipment (PPE)
- Implement process safety programs and emergency preparedness plans to prevent and mitigate incidents
- Establish and operate procedures for managing occupational injuries and illnesses

3. Environmental Sustainability

Seegene adheres to environmental laws and regulations and advances environmental stewardship. Suppliers are likewise required to comply with environmental laws and standards.

- Obtain, maintain, and renew all required environmental permits and registrations, and proactively minimize any potential negative impact on the environment and local communities, including those arising from hazardous substances, waste, wastewater, and air emissions generated during the manufacturing process.
- Conduct Life Cycle Assessments (LCA) covering production, products, and transportation when reasonably requested by Seegene and provide supporting data
- Strive to increase the use of renewable energy in production
- Prohibit the use of raw materials obtained through illegal, unethical, or environmentally harmful means that may cause environmental destruction such as health or safety risks, depletion of water resources, waste, or pollution

4. Anti-Corruption and Anti-Bribery

Seegene strictly prohibits all forms of corruption and bribery. Accordingly, our suppliers shall refrain from any conduct that could be perceived as corruption or bribery.

- Definition of Bribery: Bribery refers to the act of offering, directly or indirectly, any financial or other benefit to improperly obtain an advantage. This includes

gifts, cash, securities, entertainment, services, or other benefits. Suppliers must comply with all applicable anti-bribery laws and avoid any conduct that could give rise to the appearance of impropriety

- Gifts and Hospitality: Any gift-giving or entertainment intended to improperly influence business decisions constitutes bribery. Suppliers must not provide unlawful gifts, hospitality, or other benefits
- Travel and Accommodation: When travel or accommodation expenses must be provided to a person or entity for legitimate business purposes, only reasonable and necessary costs should be covered
- Donations and Sponsorships: Corporate donations and sponsorships should be used as part of legitimate social contribution activities, not as a means to influence business decisions or gain improper advantage
- Third Parties: Third parties may be involved in performing work for Seegene. Under no circumstances may a supplier engage in bribery or other unlawful conduct through an intermediary. Suppliers are also expected to verify that third parties involved in their work have no record of past or present involvement in corruption

[Financial Expenditures]

- Do not approve expenditures where the purpose is unclear or improper
- Follow established approval procedures and accurately document all disbursements
- Maintain a transparent internal control system to record and monitor expenditures
- Do not offer, promise, or express intent to offer improper benefits to any business partner
- Pay special attention to ensure no corruption or bribery issues arise in interactions with government officials

[Gifts, Entertainment, and Hospitality]

- The value, nature, frequency, and recipient's position must be considered when providing gifts or entertainment
- All such expenses must be recorded accurately and transparently in company books and records
- Avoid any conduct that could reasonably be interpreted as a bribe
- Never provide gifts or entertainment with the expectation of receiving a

business advantage, and do not accept gifts or entertainment that may create a conflict of interest or the appearance of bribery

[Donations and Contributions]

- Do not make or accept donations or contributions with any improper intent
- Ensure that all donations and sponsorships are made only for legitimate and lawful purposes and are not used as a vehicle for bribery

5. Compliance with Competition, Antitrust, and Intellectual Property Laws

Seegene complies with the laws and regulations of every country in which it operates. Accordingly, our suppliers are required to comply with all applicable laws, with particular attention to fair competition and antitrust regulations. Suppliers must not engage in any conduct that could result in market monopolization — including, but not limited to, price-fixing, bid-rigging, or restrictive trade agreements. Suppliers are also prohibited from abusing any dominant market position in a manner that interferes with fair and open competition.

In addition, suppliers are expected to actively protect intellectual property rights — including copyrights, patents, and trademarks — by ensuring full compliance with all applicable intellectual property laws.

- Comply with all applicable antitrust and fair trade regulations
- Refrain from actions that could be perceived as price-fixing, bid-rigging, or customer allocation
- Avoid any act that may infringe on the intellectual property rights of any business partner, particularly Seegene's IP
- Seek timely advice from qualified legal professionals when potential issues are identified
- Immediately notify Seegene of any legal violations and cooperate fully with relevant regulatory investigations

6. Avoidance of Conflicts of Interest

Conflicts of interest may arise in a variety of situations. One common example is when a supplier, while selling or distributing Seegene's products, interacts with individuals whose

interests could conflict with those of Seegene, such as Seegene employees, customers, or government officials. To prevent such issues, suppliers are expected to adhere to the following requirements:

- Do not hire, offer employment to, or engage in financial transactions with Seegene's customers or employees of Seegene's customers while acting on behalf of Seegene
- Disclose to Seegene if any supplier employee has a family relationship with a Seegene customer or a government official. Even in the absence of a family relationship, disclose any relationship that could create a potential conflict of interest
- Do not seek or obtain personal benefits through the contractual relationship with Seegene
- Implement internal controls to identify, manage, and mitigate conflicts of interest
- Immediately notify Seegene if an actual or potential conflict of interest is discovered

7. Prevention of Financial Crime

Seegene is committed to eliminating all improper activities that could lead to financial crimes, such as money laundering or the financing of terrorism. We engage only with suppliers that meet both legal requirements and Seegene's ethical standards. The financial stability and governance structure of our suppliers are carefully reviewed.

- Respond promptly and in good faith to Seegene's inquiries regarding their financial and governance structures, and provide requested documentation in a timely manner
- Maintain financial records that are accurate, complete, and transparent
- Actively investigate any suspected improper transactions by a supplier's employees, and immediately report any confirmed issues to Seegene and the relevant government authorities
- Do not instruct employees to engage in any conduct that could lead to financial crimes

8. Protection of Personal Data

Seegene places great importance on building and maintaining trust with its customers. Protecting personal data is a critical part of earning that trust, especially in the healthcare industry, where higher standards of data protection are required. Suppliers must be aware of and comply with the data protection and privacy laws of the countries in which they operate.

- Clearly state the purpose of data collection when collecting personal information
- Establish internal systems to prevent unauthorized disclosure or leakage of personal data
- Immediately notify Seegene of any data breach involving Seegene-related information and take prompt corrective measures
- Do not share personal data with any third party without prior consent
- Seek professional legal advice where necessary to ensure compliance
- Do not collect personal information beyond what is necessary for the stated and agreed purpose

9. Compliance with Import/Export Control and Customs Regulations

As a global company serving customers worldwide, Seegene is obligated to comply with all import/export control laws and customs regulations. Accordingly, suppliers must fully understand domestic and international logistics systems and comply with all relevant legal requirements. Special care must be taken to monitor import and export restrictions, as they may apply not only to physical goods but also to the transfer or sale of software and technology.

- Ensure a thorough understanding of import/export controls and customs requirements for all relevant jurisdictions before performing any related activities
- Establish an internal management system to monitor the transfer of products and technology
- Obtain and maintain all necessary declarations, permits, and licenses required for the export or transfer of products and technology

10. Accounting and Financial Managements

To maintain a relationship of mutual trust with Seegene, suppliers must comply with all applicable accounting laws and employ qualified accounting professionals to ensure transparent and reliable financial management. Suppliers have an obligation to provide customers and investors with accurate and trustworthy information. All materials provided to Seegene or disclosed to the public must contain only truthful information. Suppliers must recognize that including false information in public disclosures may result in criminal liability.

- Employ competent and trustworthy accounting personnel and establish robust internal document management systems
- Ensure that all public and non-public information is accurate, complete, and truthful
- Recognize that falsifying statements or forging documents is a serious criminal offense that may result in legal prosecution

Inquiries and Reporting

For any questions regarding this Code of Conduct or related ethical guidelines, suppliers should first consult within their own organization and follow internal procedures to seek resolution.

Employees of supplier companies are encouraged to actively report any observed violations. Suppliers must make every effort to protect the identity of whistleblowers and are obligated to conduct thorough investigations of all reported incidents.

If a supplier witnesses inappropriate behavior by Seegene employees or representatives, this must be reported to Seegene without delay.

For any questions or to report concerns, please contact: **winwinseegene@seegene.com**