



# Supplier Code of Conduct





## Overview

LifeArc’s business practices reflect fairness, openness, and integrity. These dictate how we govern the charity, how we treat our people, how we engage with local communities, and how we do business with others.

We are committed to the principles set out below in the areas of human rights, labour, the environment, and anti-corruption. Where we partner with independent organisations, we ask that our suppliers (“suppliers”) support these partnerships by sharing data and shaping their strategies in line with these principles.

We expect all our suppliers, their employees, and their sub-tier suppliers, sub-contractors and business partners to commit to LifeArc’s Supplier Code of Conduct (“code”) as a condition of doing business with LifeArc.



Through our own work and in partnerships, we accelerate healthcare innovation by transforming promising life science ideas into life-changing medical breakthroughs for patients.”



# Principles

## 1. Labour and human rights

### 1.1. Diversity in LifeArc's supplier base

LifeArc requires all organisations that seek to provide us with goods or services, or to deliver them on our behalf, to demonstrate that all reasonable steps have been taken to eliminate discrimination and promote equality of opportunity, by allowing equal access and equal treatment in employment and service delivery for all.

If requested, we expect suppliers to share details on how they promote diversity and equality as an employer and as a service provider.

### 1.2. Equal opportunities policy

Suppliers should have an equal opportunities policy statement/scheme as an employer and service provider. If they do not have this, we would require them to develop an equal opportunities policy statement when any contract starts. Suppliers should communicate this policy when recruiting, training, and promoting people.

Suppliers must comply with all relevant UK equalities legislation and accordingly not treat those who share protected characteristics (as defined by the Equality Act 2010) less favourably than others in decisions to recruit, train or promote employees.

### 1.3. Employment standards

LifeArc seeks to uphold the highest standards of honesty and integrity in its business dealings. As such, suppliers should share our commitment to human rights and equal opportunity in the workplace.

### 1.4. Child labour

LifeArc opposes the use of any form of child labour or practices that inhibit the development of children. Suppliers must comply with all applicable child labour laws and shall not employ anyone under the age of 15, or where it is higher, the mandatory school leaving age in the local country.

### 1.5. Work environment

Suppliers must provide a safe work environment, abide by local laws and regulations and ensure health and safety is effectively managed. Suppliers must ensure that health and safety risks, issues, incidents and non-compliance are identified and addressed, and that they provide adequate facilities to protect the health and wellbeing of their workforce.

### 1.6. Modern slavery

LifeArc strives to ensure we are transparent about our approach to tackling modern slavery, consistent with the disclosure obligations under the Modern Slavery Act 2015. Our policies and procedures demonstrate this commitment to act ethically and with integrity in all our interactions with stakeholders.

Suppliers must not:

- participate in human trafficking
- use forced, involuntary, or slave labour
- purchase materials or services from companies using forced, involuntary, or slave labour

Suppliers must comply with the Modern Slavery Act 2015 and be able to certify that materials included within their supply chain comply with the slavery and human trafficking laws of the country or countries in which they do business.



LifeArc's Supplier Code of Conduct describes our corporate responsibility requirements from our suppliers that provide products or services to LifeArc."



Risk in the global market has increased considerably over recent years and it is something that we need suppliers to be managing in their supply chains.”

### 1.7. Compensation and working hours

Suppliers must comply with the applicable wage and hour labour laws and regulations governing employee compensation and working hours. Suppliers should conduct operations in ways that limit overtime to a level that ensures a humane and productive work environment.

### 1.8. Human rights and non-discrimination

LifeArc respects and actively promotes human rights.. We follow the Universal Declaration of Human Rights of the United Nations.

In addition, LifeArc respects the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the UN International Labour Organisation (ILO) as well as the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Suppliers will maintain an environment free of discrimination and harassment based on gender, age, race, skin colour, ethnicity, culture or national origin, citizenship, religion or religious beliefs, physical or mental disability, veteran status, sexual orientation, or any other characteristics protected by applicable laws.





Cyber security is a growing challenge for all and we will continue to work with our suppliers to ensure the right levels of protection are in place.”

## 2. Business practices

### 2.1 Risk management

LifeArc has a programme of supplier risk assessment to ensure we have a resilient supplier base. This programme includes risk assessment questionnaires, in year event-driven assessments and audits. As part of LifeArc’s ecosystem, suppliers shall support and co-operate in the process.

Suppliers shall have a process to identify the environmental, health and safety and labour practices and ethics risks associated with their operations. The process should determine the relative significance of each risk and the implementation of appropriate procedures and physical controls to control the identified risks and ensure regulatory compliance.

### 2.2 Continuous improvement

We expect our suppliers to continuously improve their performance in general and implement appropriate measures to help them comply with labour, health and safety and environmental standards required by this code. Suppliers must have a process to correct deficiencies identified by assessments and inspections in a timely way.

### 2.3 Product safety, health & environment

Suppliers are expected to conduct their operations in a way that minimises the impact on natural resources, reduces climate change and protects the environment, customers, and employees. Suppliers must ensure their operations comply with all laws related to air emissions, water discharges, toxic substances, and hazardous waste disposal. Suppliers must maintain sufficient knowledge of input materials and components to ensure they were obtained from permissible sources, in compliance with laws and regulations. Suppliers may be required to validate this origin. Suppliers are encouraged to have strategies and targets in place to reduce their material environmental impacts including greenhouse gas emissions; and report progress against these targets annually as may be requested by LifeArc.

### 2.4 Confidentiality and data protection

Suppliers will comply with all applicable laws, regulations, and compliance requirements concerning security and data protection.

Any information, personal data, technology, know how or intellectual property (IP) that suppliers receive, or have access to, through dealings with LifeArc must be kept confidential and never used for personal gain or outside of the permitted scope. This includes commercial, technical, and financial information. Any information owned by LifeArc and disclosed to the suppliers shall, as a rule, be deemed to be private and confidential information. Suppliers will be responsible for adopting adequate security measures to protect such private and confidential information. Suppliers may not use the LifeArc trademark, images, or other materials to which LifeArc owns the copyright, unless explicitly authorised. The requirements of this section are in addition to any requirements contained within any agreement between a supplier and LifeArc.

Suppliers shall have an ongoing process to create and maintain documents and records to ensure regulatory compliance, and to enable audit where appropriate, and conformity to this code and the contractual terms of any agreement(s).

Suppliers shall conduct themselves and their services while on LifeArc property or in LifeArc’s IT network in a secure manner, consistent with LifeArc’s security policies and standards. Supplier shall ensure that its business practices are consistent with sound industry standard security practices.

### 2.5 Conflict of interest

Suppliers will avoid engaging in any business activity that could create an actual or perceived conflict between the suppliers’ interest and those of LifeArc. Suppliers should maintain robust internal processes to ensure that private interests and personal consideration shall not affect any business decision or action with respect to LifeArc. Suppliers becoming aware of a conflict-of-interest situation will immediately notify LifeArc.



We operate to the same standards of behaviour that we expect from our suppliers.”

## 3. Standards of behaviour

### 3.1 Ethical behaviour

To meet social responsibilities, suppliers and their next-tier suppliers, sub-contractors and business partners are required to conduct business in an ethical manner and act with integrity.

### 3.2 Counter fraud and corruption

LifeArc does not tolerate any form of corruption. Suppliers will comply with applicable laws and regulations concerning:

- anti-bribery
- anti-money laundering
- anti-corruption, including those concerning foreign corruption practices

Suppliers will neither engage in nor tolerate:

- any form of corruption
- bribery
- theft
- embezzlement
- extortion
- use of illegal payments, including without limitation, any payment or other benefit conferred on any individual, company, or government official for the purpose of influencing the decision-making process in violation of applicable laws

Supplier records should always accurately reflect business activities and include accurate accounting, financial controls, internal reporting, and taxation records.

Suppliers must not offer illegal benefits or illegal favours such as bribery payments, kickbacks, or other illegal benefits including inappropriate gifts and undue hospitality towards LifeArc employees in exchange for business opportunities.

Suppliers will strictly comply with all applicable anti-trust laws, trade practice laws and any other competition laws, rules and regulations, dealing with, for example, monopolies, unfair competition and restraints of trade, and relationships with competitors and customers. Suppliers will not enter into agreements with competitors or engage in other acts that may unfairly impact competition, including, but not limited to, price fixing or market allocations.

### 3.3 Conflict minerals

Suppliers must adhere to applicable legal requirements in relation to “conflict minerals” originating from conflict areas and shall ensure compliance with such laws. Additionally, suppliers will use best efforts to avoid the use of raw materials in their products that directly or indirectly finance groups violating human rights.

### 3.4 Export and import regulations

It is LifeArc policy to strictly comply with all applicable export controls, sanctions laws and regulations, customs requirements, and related reporting obligations.

Suppliers must operate in strict compliance with such regulations as well.

Specifically, suppliers will comply with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods, technology, and payments.

Suppliers shall immediately notify LifeArc of any concerns, knowledge of potential non-compliance, or other issues related to export, sanctions and customs compliance.

### 3.5 Corporate governance and corporate social responsibility

Suppliers will comply with all applicable laws, rules, and regulations in the countries in which they operate and will maintain suitable measures to ensure compliance with such laws, rules, and regulations. In the case that LifeArc’s requirements are more stringent than local requirements, suppliers will be required to meet the terms of this code and the particular contract between the supplier and LifeArc.



## 4. Compliance with this code

This code contains general requirements applicable to all our suppliers and which our suppliers agree to follow as a condition of doing business with LifeArc. Suppliers' particular contracts with LifeArc and relevant applicable laws may contain more specific or additional provisions addressing some of these same issues.

Nothing in this code is meant to supersede any provisions of a particular contract or relevant applicable law, and to the extent there is any direct conflict between this code and any provision of a particular contract or relevant applicable law, the contractual provision or relevant applicable law will control.

Suppliers will use their best efforts to be familiar with the business practices of their suppliers, sub-contractors and other business partners and to require all such suppliers, sub-contractors and business partners to comply with this code or the values it contains.

Suppliers and LifeArc can discuss any questions or potential violations in relation to this code in a prompt, open and respectful manner. In addition, suppliers shall also report violations of this code promptly to LifeArc and people can also call the LifeArc SafeCall Helpline at 0808 951 1571, or submit a report online at [www.safecall.co.uk/report](http://www.safecall.co.uk/report)



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**Company number**

LifeArc is a company limited by guarantee no. 2698321 incorporated in England and Wales.

**Charity numbers**

LifeArc is a charity registered with the Charity Commission for England and Wales no. 1015243 and a charity registered in Scotland with the Office of the Scottish Charity Regulator no. SC037861.

