

This document outlines Nucleus Global's Principles for Responsible Supply Chain Management (the "Principles") for ethics, labour, health and safety, environment and related management systems. These Principles incorporate the Pharmaceutical Industry Principles for Responsible Supply Chain Management.

Purpose

Nucleus Global is committed to conducting our dealings with suppliers to the highest standards of quality and in line with a sustainable and ethical business.

This Code of Conduct sets out the principles for the behavioural standards that Nucleus Global expects from all its suppliers, and those within a supplier's sphere of influence that assist them in performing their obligations to the company. Nucleus Global believes that society and business are best served by responsible business behaviours and practices. Fundamental to this belief is the understanding that a business must, at a minimum, operate in full compliance with all applicable laws, rules and regulations.

Nucleus Global will not do business with any supplier that deviates from the accepted Principles outlined in this document and will cease business any supplier found to be non-compliant. Audits of suppliers will be performed at intervals to ensure Nucleus Global meets its obligations in relation to conducting an ethical and sustainable business that respects the rights, health and safety of all individuals.

Ethics

Nucleus Global expects all third-party suppliers to follow this Code of Conduct and comply with all legislation and regulations. The Company will investigate any supplier on suspicion of violating of this Code of Conduct. Outcomes of any such violation could result in the termination of the contract with that supplier and if required, reporting to authorities. Nucleus Global encourages all its suppliers and their employees to report concerns or illegal activities in the workplace to relevant authorities without the threat of reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action if needed. Specific expectations are outlined below.

Business Integrity and Fair Competition

All forms of corruption, extortion and embezzlement are prohibited. Suppliers shall not pay or accept bribes or participate in other illegal inducements in business or government relationships. Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws. Suppliers shall employ fair business practices including accurate and truthful advertising.

Privacy

Suppliers shall safeguard and make only proper use of confidential information under the Data Protection Act 2018 and any subsequent updates, ensuring that the company's and individuals' right to privacy are protected.

Suppliers shall have the proper organizational structure, processes and procedures to ensure the protection, confidentiality, integrity and availability of information against accidental, unauthorized or unlawful loss, destruction, alteration, disclosure, use, transfer or access. Suppliers should notify Nucleus of any suspected or actual data or security breach concerning the services/deliverables/goods provided within 48 hours of becoming aware of the incident.

Human rights

Nucleus Global expects its suppliers to support, respect and protect human rights in accordance with the UN's Universal Declaration of Human Rights, and to ensure that they are not complicit in any human rights abuses.

Environment, Health and Safety Standards

Nucleus Global expects its suppliers to adhere to health and safety regulations and standards, and to implement all precautions to protect the health and safety of its workers.

Labour

- Nucleus Global is fully compliant with the UK Modern Slavery Act 2015 and expects all its suppliers to show similar alignment.
- Nucleus Global expects its suppliers to recognise and respect the rights of its employees to associate freely and to organise and bargain collectively in accordance with the local laws in which they are employed.
- Nucleus Global expects its suppliers to prohibit the use of all forms of forced or compulsory labour in relation to its workers.
- Nucleus Global expects its suppliers not to use child labour and to support effective abolition of child labour.
- Nucleus Global's suppliers are expected to promote diversity and inclusion by not discriminating on the grounds of race, religion, gender, sexual orientation, age, physical ability, health condition, HIV status, political opinion, nationality, social or ethnic origin, union membership, marital status or pregnancy, while hiring and employing workers.
- Suppliers shall be committed to uphold the human rights of workers and to treat them with dignity and respect. The Labour elements include:
 - Freely Chosen Employment
 - *Suppliers shall not use forced, bonded or indentured labour or involuntary prison labour.*
 - Child Labour and Young Workers
 - *Suppliers shall not use child labour under the age of 16. The employment of young workers between >16–18 shall only occur in non-hazardous work and when said workers are above a country's legal age for employment or the age established for completing compulsory education.*
 - Non-Discrimination
 - *Suppliers shall provide a workplace free of harassment and discrimination on any of the grounds listed above'.*
 - Fair Treatment
 - *Suppliers shall provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers and no threat of any such treatment.*
 - Wages, Benefits and Working Hours
 - *Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours, where applicable, and mandated benefits.*
 - Freedom of Association
 - *Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged.*
 - *Suppliers shall respect the rights of workers to associate freely, join or not join labour unions, seek representation and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.*

Health and Safety

Suppliers shall provide a safe and healthy working environment, including for any company provided living quarters. The Health and Safety elements include:

- Worker Protection
 - *Suppliers shall protect workers from over exposure to chemical, biological, physical hazards and physically demanding tasks in the work place and in any company provided living quarters.*
- Process Safety
 - *Suppliers shall have programmes in place to prevent or mitigate catastrophic releases of chemicals.*
- Emergency Preparedness and Response
 - *Suppliers shall identify and assess emergency situations in the workplace and any company provided living quarters, and to minimize their impact by implementing emergency plans and response procedures.*
- Hazard Information
 - *Safety information relating to hazardous materials shall be available to educate, train, and protect workers from hazards.*

Protecting the environment

Suppliers shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible and to engage in activities that reuse and recycle. Nucleus Global expects its suppliers to:

- support and promote environmental protection, and to comply with local environmental laws and regulations.
- promote greater environmental responsibility and support Nucleus Global in the use of goods and services which help mitigate any environmental impact, as well as better managing and utilising resources such as energy, paper, water and waste.
- promote the development and distribution of environmentally friendly technologies.
- comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed.
- have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.
- have systems in place to prevent and mitigate accidental spills and releases to the environment.

Management Systems

Suppliers shall use management systems to facilitate continual improvement and compliance with the expectations of these principles. The management system elements include:

- Commitment and Accountability
 - *Suppliers shall demonstrate commitment to the concepts described in this document by allocating appropriate resources.*
- Legal and Customer Requirements
 - *Suppliers shall identify and comply with applicable laws, regulations, standards and relevant customer requirements.*
- Risk Management
 - *Suppliers shall have mechanisms to determine and manage risks in all areas addressed by this document.*
- Documentation
 - *Suppliers shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.*
- Training and Competency
 - *Suppliers shall have a training programme that achieves an appropriate level of knowledge, skills and abilities in management and workers to address these expectations.*
- Continual Improvement
 - *Suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.*