

Spark Supplier Code of Conduct

Spark is committed to sustainability in all business activities and aims to apply the highest ethical standards. Our suppliers (suppliers, service providers, and contract manufacturers) play an important role as enablers of our sustainable growth and overall success.

Spark promotes innovation and strives for economic, social, and environmental sustainability in order to ensure delivery of our products to patients and the long-term success of Spark and its stakeholders. Spark regards lasting innovation as our biggest contribution to society. Our suppliers are business partners with expertise and capabilities that we use to enable improvements in efficiency, effectiveness, and business continuity, which in turn allow us to deliver medical innovations to address the needs of our patients and benefit society. In delivering innovation, Spark is expected by our patients and stakeholders to uphold high standards of responsible and ethical behavior in our operations and to hold our suppliers to the same high standards.

As a member of the Roche Group, Spark supports the principles of the Pharmaceutical Supply Chain Initiative (PSCI), a non-profit industry organization that brings together members to define, establish, and promote responsible supply chain practices. This Spark Supplier Code of Conduct embeds the PSCI Principles and addresses its main areas: ethics, human rights and labor, health and safety, environment, and related management systems

Spark does not tolerate bribery or any other form of corrupt business behavior.

Spark is fully committed to supporting and respecting human rights. Spark strives to support and respect the protection of human rights as an integral part of our business, including by assessing risks, increasing awareness, and fostering due diligence; not being complicit in human rights abuses; and ensuring that our supply chain reflects Spark's values and respect for human rights and the environment.

We require our suppliers to explicitly acknowledge and adhere to the principles embodied in the Supplier Code of Conduct. Suppliers must also ensure that their own suppliers appropriately ensure compliance with these principles along their own supply chains. Suppliers shall ensure that Spark can verify compliance with this Supplier Code of Conduct through the Supplier Sustainability Assurance Visit (SSAV) program. Suppliers that fail to meet Spark's expectations on the topics outlined in this Spark Supplier Code of Conduct might be disqualified from inclusion in Spark's supplier portfolio and consequently excluded from it.

Suppliers supporting these principles:

- Will apply these principles in their own supplier programs and ensure that their own suppliers appropriately ensure compliance with these principles along their own supply chains.
- Will adhere to the same ethical principles and work with their own suppliers on anti-corruption.
- Will follow local laws and regulations that might be more stringent than the principles set forth in this Supplier Code of Conduct.
- Believe that society and business are best served by responsible business behaviors 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.

- Are aware of differences in culture and the challenges associated with interpreting and applying these principles globally. While suppliers supporting the principles believe that what is expected is universal, it is understood that the methods for meeting these expectations may be different and must be consistent with the laws, values, and cultural expectations of the different societies in the world.
- Believe that these principles are best implemented through a continual improvement approach that advances supplier performance over time.

Ethics

Suppliers shall conduct their business in an ethical manner and act with integrity. The ethics elements include:

Business Integrity and Fair Competition

All 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 antitrust laws. Suppliers shall employ fair business practices, including accurate and truthful advertising.

Animal Welfare

Animals shall be treated respectfully, with pain and stress minimized. Animal testing should be performed after consideration to replace animals, reduce the numbers of animals used, or refine procedures to minimize distress. Alternatives should be used wherever scientifically valid and acceptable to regulators.

Privacy

Suppliers shall safeguard and make only proper use of confidential information to ensure that company, worker and patient privacy rights are protected.

Human Rights and Labor

Suppliers shall be committed to ensuring the human rights of workers and to treating them with dignity and respect. The labor elements include:

Freely Chosen Employment

Suppliers shall not use forced, bonded, indentured, or involuntary prison labor.

Child Labor and Young Workers

Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in works conducted by them that do not cause harm to their health, safety, or morale and when young workers are above a country's legal age for employment or the age established for completing compulsory education.

Fair Treatment and Non-discrimination

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. Suppliers shall provide a workplace free of harassment and discrimination. Discrimination for reasons such as color, age, gender, sexual orientation, ethnicity, physical or mental disability, other health-related issues, religion, political affiliation, union membership or marital status or any other characteristics protected by applicable laws or regulations, is not tolerated.

Wages, Benefits, and Working Hours

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers shall consider remuneration in accordance with the skills, performance and experience of their workers based on local competitive conditions, as well as offer benefits in accordance with local market practices. Suppliers shall communicate to the worker the basis on which they are being compensated in a timely manner. Suppliers are also expected to communicate to the worker whether overtime is required if allowed by the local employment laws and regulations and the wages paid for such overtime.

Freedom of Association and the Right of Collective Bargaining

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils, participate in collective bargaining and undertake the rights according to the local employment laws and regulations. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

Conflict Minerals and Metals

Suppliers shall safeguard and make sure that they use and import conflict minerals and metals from responsible sources only. Suppliers shall ensure that no compulsory, child or forced labor was used to mine or process those minerals or metals.

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:

Occupational Health and Industrial Hygiene

Suppliers shall understand relevant workplace hazards and effectively communicate such hazards and related protection to all potentially impacted workers. Suppliers shall protect workers from overexposure to ergonomic, chemical, biological and physical hazards, physically demanding tasks in the workplace and in any company-provided living quarters. Hazards also include potential negative impacts on general worker well-being.

Emergency Preparedness and Response

Suppliers shall identify and assess emergency situations in the workplace and any company-provided living quarters, and minimize their impact by providing emergency response equipment and supplies, implementing emergency plans and response procedures, including regular emergency response drills.

Environment

Suppliers shall operate in an environmentally responsible and efficient manner, and they shall 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. The environmental elements include:

Environmental Compliance

Suppliers shall comply with all applicable environmental laws and regulations. All required environmental permits, licenses, information registrations, chemical registrations, and restrictions shall be obtained and their operational and reporting requirements followed.

Hazardous Materials

Suppliers should support Spark in minimizing the chemical footprint of Spark activities and products. Suppliers should commit to minimizing and, if practicable, eliminating the use of any substance or material that may cause environmental damage; minimizing environmental risks by employing safe technologies and operating procedures; and being prepared to respond appropriately to accidents and emergencies.

Waste and Emissions

Suppliers shall 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.

Greenhouse Gas Emissions

Suppliers are encouraged to quantify, disclose, and take action to reduce greenhouse gas emissions and support their suppliers to do the same.

Spills and Releases

Suppliers shall have systems in place to prevent, mitigate, and communicate accidental spills and releases to the environment.

Governance and Management Systems

Suppliers shall use management systems to facilitate continual improvement and compliance with these principles. The management systems 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 and review them at least once a year as well as on an ad hoc basis if the risk situation has significantly changed or expanded.

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 program that achieves an appropriate level of knowledge, skills, and abilities in management and workers to address these expectations.

Due diligence and transparency

Suppliers shall have systems allowing them to carry out due diligence on their own supply chain. Suppliers shall provide supply chain transparency to Spark, if required, regarding human rights risks and conflict minerals and metals.

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.

Identification of Concerns and Complaints Procedure

If a supplier or their workers believe that anyone in their company or in Spark's supply chain has acted contrary to the principles of this Supplier Code of Conduct, they are encouraged to report the concerns to the Spark Compliance and Business Ethics Helpline. Details are available at compliance.sparktx.com.

Suppliers shall establish their own complaints procedure and encourage their workers to report concerns or information regarding non-compliance, especially on actual or potential illegal activities in the workplace or adverse human rights impacts or environmental impacts resulting from suppliers' own operations, without threat of retaliation, reprisal, intimidation, or harassment. Suppliers shall investigate and take corrective action if needed.

In addition to the PSCI Principles, the following principles are of importance for Spark:

Intellectual Property

Spark delivers medical innovations that improve people's health and quality of life by working with suppliers that can best meet our business demands and requirements in terms of cost, innovation, integrity, quality, suitability, credibility, and sustainability. As business partners supporting Spark's efforts, suppliers shall respect Spark's intellectual property rights, protect Spark's trade secrets and confidential information, and safeguard customer information. Suppliers shall manage technology and know-how in a manner that protects intellectual property rights.

Economic Sustainability

Suppliers are encouraged to help foster social and economic development and contribute to the sustainability of the communities in which they operate.

Supplier Diversity

Suppliers shall engage socially and economically different categories of suppliers through inclusive sourcing processes that promote equal opportunities.

The Spark Supplier Code of Conduct was proposed by the Procurement Department and was approved by Chief Business Officer Michael Retterath. It enters into force as of January 1, 2024.