



Supplier Code of Conduct

Pace® Corporate

APPROVAL/SIGNATORY PAGE

The undersigned acknowledge they have reviewed and approve this policy and agree to uphold the requirements presented. Future changes to this policy will be reviewed and approved by the undersigned roles or their designated representatives.

| Title, Division, Name | Signature & Date |
|---|--|
| Chief Executive Officer Pace® Corporate Eric Roman | DocuSigned by: <i>Eric Roman</i> 2/5/2024 12:55 PM EST |
| Chief Compliance Officer Pace® Corporate Judith Morgan | C12C7651DC1A4D4... DocuSigned by: <i>Judith Morgan</i> 2/1/2024 1:53 PM PST |
| VP of Human Resources Pace® Corporate Nicole Ott | UB186645035B4E0... DocuSigned by: <i>nicole ott</i> 2/5/2024 6:24 AM PST |
| Chief Information Officer Pace® Corporate Kyle Korzenowski | ECA6307D3B3E4C9... DocuSigned by: <i>kyle korzenowski</i> 2/5/2024 7:58 AM EST |
| Chief Financial Officer Pace® Corporate Mike Hausman | 75C8DAC84CF148D... DocuSigned by: <i>Mike Hausman</i> 2/1/2024 1:43 PM PST |
| President Pace® Analytical Services Greg Whitman | E57B3D1ACDA2488... DocuSigned by: <i>Greg Whitman</i> 2/4/2024 4:57 AM PST |
| President Pace® Life Sciences Dawn Von Rohr | ABEB73E4143F417... DocuSigned by: <i>Dawn Von Rohr</i> 2/2/2024 12:58 PM EST |
| Supply Chain Director Pace® Analytical Nathan Pachel | E316A75BA4814C6... DocuSigned by: <i>Nathan Pachel</i> 2/1/2024 1:47 PM PST |

Policy Owner (s): Chief Financial Officer & Supply Chain Director

| | |
|---|-------------------------------|
| Doc No.: COR-POL-0047 | |
| Revision Date & No.: 1/4/2024 R0 | Issue Date: 02/01/2024 |



Supplier Code of Conduct

Pace® Corporate

Contents

- 1.0 Purpose 3
- 2.0 Scope and Applicability 3
- 3.0 Definitions 3
- 4.0 Policy 3
 - 4.1 Labor and Human Rights 3
 - 4.2 Occupational Safety 4
 - 4.3 Environmental Conservation & Sustainability 4
 - 4.4 Ethical Integrity 5
 - 4.5 California Privacy Rights Act (CPRA) 5
- 5.0 Supplier Evaluation – Evaluation Process Under Development; ETD 03/31/24 6
- 6.0 Audits and Monitoring 6
- 7.0 Reporting 6
- 8.0 Responsibilities 7
 - 8.1 Approvals 7
 - 8.2 Implementation 7
- 9.0 Attachments 7
- 10.0 References 7
- 11.0 Revision history 8

| | |
|---|-------------------------------|
| Doc No.: COR-POL-0047 | |
| Revision Date & No.: 1/4/2024 R0 | Issue Date: 02/01/2024 |



Supplier Code of Conduct

Pace® Corporate

1.0 PURPOSE

This policy provides information and requirements related to the standards established by Pace® for Ethics and Professional Conduct and is required of all suppliers of Pace®. This policy is established to ensure these standards are communicated to and understood by Pace® Suppliers.

2.0 SCOPE AND APPLICABILITY

2.1. This policy applies to suppliers for all Pace® divisions and locations.

2.2. All Pace® Suppliers are expected to comply, in all business activities, with each of the following standards, in addition to local, national and international laws, rules and regulations established.

3.0 DEFINITIONS

Suppliers – Any individual or business entity that provides Pace® with products or services.

4.0 POLICY

4.1 Labor and Human Rights

4.1.1 No Child Labor or Forced Labor

Pace® is committed to a work environment that is free from human trafficking and slavery, which for our purposes includes forced labor and unlawful child labor. Suppliers will not employ children under the minimum employment age or engage in business that will jeopardize the health and safety of workers under the age of 18. Forced labor will not be tolerated and workers must be provided conditions of employment in a language that they can understand prior to beginning employment.

4.1.2 Non-discrimination or Inhumane Treatment

Pace® Suppliers will not discriminate in hiring or employment based on race, skin color, nationality, age, gender and sexual orientation/gender identity, ethnicity, disability, pregnancy, religion, political opinion, labor union membership, marital status, or any other factor irrelevant to business. The human rights of all workers shall be protected and inhumane treatment such as harassment or abuse of any kind is not tolerated.

4.1.3 Compensation and Workers rights

All workers shall be compensated fairly and working hours will not exceed local regulations without appropriate overtime compensation. Efforts will be made to guarantee workers can communicate openly with management without fear of retaliation. Employees shall not be unlawfully terminated.

| | |
|---|-------------------------------|
| Doc No.: COR-POL-0047 | |
| Revision Date & No.: 1/4/2024 R0 | Issue Date: 02/01/2024 |



Supplier Code of Conduct

Pace® Corporate

Suppliers also guarantee their workers the right to associate freely, join or refrain from joining labor unions, bargain collectively, engage in peaceful assembly, and other such actions in accordance with local laws and regulations.

4.1.4 Conflict Minerals

Suppliers shall not use conflict minerals (tantalum, tin, tungsten, gold) sourced from, but not limited to the following: Sudan, Central Africa Republic, Uganda, Congo Republic, Angola, Tanzania, Rwanda, Burundi, Democratic Republic of Congo, Zambia, and Angola.

4.2 Occupational Safety

4.2.1 Workplace safety

Pace® Suppliers shall act appropriately to reduce health and safety risk for all employees. Employees shall be provided with proper safety and health information, training, and equipment.

4.2.2 Occupational Safety and Preparedness

Pace® suppliers will understand the risk of injury and illness associated with their business processes, disasters, etc. and take appropriate preventive measures to reduce these risks. Such measures include:

- a. Providing employees with necessary training or drills to ensure employees are aware of and prepared for all potential safety risks.
- b. Managing work that may pose hazards to employees relating to physically or mentally demanding work.
- c. Properly training employees on how to operate, inspect and maintain all equipment related to their day-to-day activities.

4.3 Environmental Conservation & Sustainability

4.3.1 Environmental Regulation Compliance

All required environmental permits will be obtained, and reporting requirements will be fulfilled in accordance with local laws and regulations.

4.3.2 Conservation of Energy & Environmental Protection

Pace® Suppliers shall demonstrate commitment to the conservation of biodiversity by considering adverse impacts of their business and products on the environment and working to minimize these impacts, including:

- a. Work to conserve energy in operations.
- b. Prevent the discharge of hazardous chemicals into the environment.
- c. Reduce harmful air pollutants released into the atmosphere.
- d. Prevent hazardous wastewater from leaking into the environment.
- e. Identify and contain hazardous substances in products and follow laws and regulations regarding them.

| | |
|---|-------------------------------|
| Doc No.: COR-POL-0047 | |
| Revision Date & No.: 1/4/2024 R0 | Issue Date: 02/01/2024 |



Supplier Code of Conduct

Pace® Corporate

4.3.3 Environmental Sustainability

Pace requires our suppliers to purchase goods, services and supplies in a way that minimizes the impact on the environment and society where it is practical and economically viable. Suppliers are expected to employ best practices combined with ethical values in achieving natural resource utilization, energy conservation, and waste minimization that promote a safe and sustainable approach to the business.

4.4 Ethical Integrity

4.4.1 Safeguards and other mechanisms shall be established to:

- a. Prevent all forms of corruption, extortion, bribery, and fraud.
 - We do not tolerate, engage in, or permit corruption, bribery, facilitating payments or fraud in any form including gifts and entertainment. (Pace® Anti-Bribery and Anti-Corruption Policy)
- b. Ensure no action is taken to inhibit fair competition in the marketplace.
 - We encourage fair and transparent competition when sourcing goods and services.
- c. Provide up to date and accurate information to all customers pertaining to product information and services.
- d. Protect sensitive, privileged, and confidential information and data.
- e. Protect whistleblowers from retaliation.
 - Supplier shall provide an anonymous complaint mechanism for employees to report workplace grievances.
 - Supplier shall protect whistleblower confidentiality and prohibit retaliation.

4.5 California Privacy Rights Act (CPRA)

4.5.1 General Requirements

Contracts between a business and a service provider, contractor, or third party must include terms that:

- a. Specify that personal information is sold or disclosed by the business only for limited and specified purposes.
- b. Obligate the third party, service provider, or contractor to comply with applicable obligations under the CPRA and obligate those persons to provide the same level of privacy protection as is required by the CPRA.
- c. Grant the business rights to take reasonable and appropriate steps to help ensure that the third party, service provider, or contractor uses the

| | |
|----------------------------------|------------------------|
| Doc No.: COR-POL-0047 | |
| Revision Date & No.: 1/4/2024 R0 | Issue Date: 02/01/2024 |



Supplier Code of Conduct

Pace® Corporate

personal information transferred in a manner consistent with the business' obligations under the CPRA.

- d. Require the third party, service provider, or contractor to notify the business if it decides that it can no longer meet its obligations under the California Consumer Privacy Act (CCPA).
- e. Grant the business the right, upon notice, to take reasonable and appropriate steps to stop and remediate unauthorized use of personal information.

4.5.2 Additional Requirements – Personal Information

Contracts between a business and a service provider or contractor, including certain prohibitions on the usage of personal information.

Specifically, these contracts must include terms that prohibit:

- a. Selling or sharing personal information
- b. Retaining, using, or disclosing the personal information or any purpose other than for the business purposes specified in the contract for the business
- c. Retaining, using, or disclosing the information outside of the direct business relationship; and
- d. Combining personal information from various sources – an area also subject to future regulations.
- e. Further if the contract is between a business and the contractor, the contractor must certify that it understands and will comply with these restrictions.

5.0 SUPPLIER EVALUATION – EVALUATION PROCESS UNDER DEVELOPMENT; ETD 03/31/24.

6.0 AUDITS AND MONITORING

Pace® will take appropriate action against employees, agents, customers, and suppliers who violate this policy. Violators of this policy may be subject to disciplinary action up to and including termination of employment, and Suppliers who fail to comply with the Supplier Code of Conduct may be subject to termination as a supplier and subsequent applicable legal action.

7.0 REPORTING

ALL Pace® employees have a responsibility to report any circumstance that may involve a violation of this policy and may do so anonymously. ANYONE may report concerns through the Pace® Alertline via call, email or log-in to the third-party reporting service and following the instructions.

- Phone: English speaking USA and Canada: (844) 970-0003
- Phone: Spanish speaking North America: (800) 216-1288
- Website: www.lighthouse-services.com/pacelabs

| | |
|---|-------------------------------|
| Doc No.: COR-POL-0047 | |
| Revision Date & No.: 1/4/2024 R0 | Issue Date: 02/01/2024 |



Supplier Code of Conduct

Pace® Corporate

- E-mail: reports@lighthouse-services.com – make sure you include the name of our organization, Pace® (pacelabs), in the email so that Lighthouse knows which company to assign the report.

Pace® treats all reports confidentially to the extent possible, consistent with the law, company policy, and the requirements necessary to conduct an effective investigation. All reports will be promptly and thoroughly investigated, consistent with applicable law. Pace® will not tolerate any form of retaliation against anyone for making a good faith report of actual or potential misconduct.

8.0 RESPONSIBILITIES

8.1 Approvals

This policy must be approved by the Chief Executive Officer (CEO), the Chief Financial Officer (CFO), President of Pace Analytical Services, President of Pace Life Sciences, Chief Compliance Officer (CCO), Vice President of Human Resources and the Supply Chain Director.

8.2 Implementation

Pace® Procurement is responsible for implementation of and communication of this policy to all existing and future Suppliers.

9.0 ATTACHMENTS

Example Supplier Evaluation Form – under development

10.0 REFERENCES

Pace® Policies/Documents (Current versions) – All suppliers must acknowledge and support the following Pace® policies.

- Code of Ethics and Professional Conduct (COR-POL-004)
- Information Technology Policy (COR-POL-0010)
- Human Rights Policy (COR-POL-027)
- Anti-Bribery and Anti-Corruption Policy (COR-POL-029)
- Pace Compliance Alertline Policy (COR-POL-0001)
- Harassment and Inappropriate Behavior Policy
- Chemical Hygiene Plan / Safety Manual (COR-MAN-0001)
- Fleet Safety Program (COR-MAN-0002)
- Sustainable Procurement Policy
- Environmental Policy

| | |
|---|-------------------------------|
| Doc No.: COR-POL-0047 | |
| Revision Date & No.: 1/4/2024 R0 | Issue Date: 02/01/2024 |



Supplier Code of Conduct

Pace® Corporate

11.0 REVISION HISTORY

| Author(s) ¹ | Job Title | Date Completed |
|------------------------|-----------------------|----------------|
| Nate Pachi | Supply Chain Director | 1/4/2024 |
| Casey Calhoon | Purchasing Analyst | 1/4/2024 |
| | | |

¹ The first author listed is the primary author of this document and questions about management of this document should be directed to the primary author.

Substantive Revisions Made to this Version from Prior Version:

| Section | Description of Change |
|---------|-----------------------|
| | |
| | |
| | |
| | |

| | |
|---|-------------------------------|
| Doc No.: COR-POL-0047 | |
| Revision Date & No.: 1/4/2024 R0 | Issue Date: 02/01/2024 |