

## Seegene Partner Code of Conduct

Seegene's Partner Code of Conduct states our fundamental expectations of suppliers' business operations in relation to labor, human rights, health and safety, environmental protection, supply chains, and compliance with applicable laws (including anti-corruption and anti-bribery laws) and ethics. This Code applies to all our suppliers as well as their subsidiaries, suppliers, subcontractors and manufacturers' agents. Suppliers are obligated to share this Code with all individuals who perform work for and/or on behalf of Seegene (suppliers: defined as all third-parties who provide products or services to Seegene).

All suppliers are required to understand and abide by this Code. Seegene may assess suppliers for their compliance with the Code through reasonable means. Suppliers should take all necessary measures to implement and sustain this Code, and are obligated to take action when reasonably requested by Seegene.

- Suppliers should establish internal programs on their code of ethics or compliance management in reflection of domestic/global laws and regulations, and provide regular training to employees on major compliance issues.
- Suppliers should notify the Code of Conduct to dispatched workers and all its workforce.
- When applicable laws and regulations or ethical standards are breached, suppliers should inform this to Seegene and proactively seek solutions.

### **1. Human Rights and Labor**

Seegene respects a wide array of international initiatives adopted and announced by international organizations concerning basic human rights, including but not limited to the Universal Declaration of Human Rights of the UN, the UN Guiding Principles on Business



and Human Rights, and fundamental ILO (International Labor Organization) conventions. We demand that our suppliers also adhere to applicable laws and standards in line with these initiatives.

- Suppliers should not hire children and teens below the minimum legal age.
- Suppliers should prohibit all forms of work imposed on workers in the absence of their free will, including compulsory labor and labor abuse, and prepare employment contracts specifying terms of employment in the primary language spoken by workers.
- Suppliers should prohibit discrimination concerning such employment practices as recruitment, promotion, compensation and training opportunities on the grounds of race, skin color, age, gender, sexual identity, country of origin, nationality, disability, pregnancy, religion, political association, union membership and marriage.
- Suppliers should respect the human dignity of all workers, and create a working environment void of any inhumane treatment or intimidation, including but not limited to sexual harassment, abuse, corporal punishment, psychological or physical coercion, or verbal abuse.
- Suppliers should abide by all applicable legal standards concerning maximum working hours and days, minimum wage, welfare & benefits, overtime hours, and compensation.
- Suppliers should recognize the freedom of association and the right to collective bargaining as guaranteed by law, and create an environment for workers to communicate on labor conditions with management without fear of discrimination, reprisal, intimidation or harassment.

## **2. Health and Safety**

Seegene adheres to applicable laws and regulations to provide a safe and sanitary working environment. We expect our suppliers to do the same by abiding by applicable laws and standards.

- Suppliers should take preemptive action to avoid any risk factors in the workplace. Exposure to potential safety risks should be managed through appropriate control, preventive maintenance, safe work procedures, and fit-for-purpose health and safety training.
- Suppliers should provide workers with information associated with chemical substances, including chemical materials and compounds, to protect workers.
- Suppliers should provide workers with appropriate personal protective equipment to keep them safe.
- Suppliers should implement and maintain activity and emergency response plans to make their processes safer to prevent and mitigate accidents.
- Suppliers should implement processes to manage work-related injuries and illnesses.

### **3. Environmental Sustainability**

Seegene abides by environmental laws and regulations and advances environmental management. We expect our suppliers to also comply with environmental laws and standards.

- Suppliers should do their utmost to obtain, maintain and renew all mandatory environmental approvals and registrations and to preemptively minimize any and all adverse impact emanating from hazardous substances, waste & wastewater, and air pollution on the environment and the local communities where they operate.
- Suppliers should perform life cycle assessments on their manufacturing, products, and transportation and provide environmental data to support such assessments when reasonably requested by Seegene.
- Suppliers should endeavor to expand the use of renewable energy in the product manufacturing process.
- Suppliers should prohibit the use of raw materials sourced through illegal, unethical or inappropriate means that may give rise to safety-related risks, the depletion of water

resources, waste, pollution and other types of environmental destruction.

#### **4. Anti-corruption and Prohibition of Bribery**

Seegene strictly prohibits corruption and bribery. Our suppliers are expected not to engage in any action that may constitute corruption or bribery.

- Bribe offering is defined as providing economic benefits either directly or through agency in exchange for unjustifiable gain from the one receiving such bribes including gifts, money, securities, entertainment and labor. Suppliers should abide by bribery-related laws and not engage in any action that may cause misperceptions.
- The act of influencing the decision made by the counterparty by offering gifts or entertainment is considered a type of bribery. Suppliers should not provide illegal gifts, entertainment and hospitality.
- When suppliers compensate a person who performed work for the purpose of conducting their business for expenses such as transportation and lodging expenses, they should do so at reasonable levels.
- Suppliers may give back to society through sponsorships or donations to fulfill their social responsibility. Meanwhile, they should ensure such actions are not misused as a means of bribery.
- Conducting business may engage individuals or companies other than employees of Seegene and its suppliers. Suppliers should not commit any illegal act such as bribery through agency under any circumstances. They should also identify whether those involved in business conduct were or are complicit in any corruptive practices based on relevant records. As to expenditures, gifts/entertainment/hospitality, and sponsorships/donations, suppliers should observe the following.

[Expenditure]

- Suppliers should not pay expenditures when their purpose is not clear nor appropriate.



- Suppliers should pay expenditures in accordance with the set process and clearly document them.
- Suppliers should establish an internal management system for expenditure documentation.
- Suppliers should not offer unjustified benefits to their transaction counterparty nor promise or express any intent to do so.
- Suppliers should take caution to ensure the issues of corruption or bribery do not occur in entering into a contract with public officials.

[ Gift/Entertainment/Hospitality ]

- In offering gifts or entertainment, supplier should consider their value, type, frequency and the position of the recipient.
- Suppliers should document the offering of gifts and entertainment in their company book transparently and accurately.
- Suppliers should not engage in any action that could be misunderstood as bribery in consideration of surrounding circumstances.
- Suppliers should not provide any gifts or entertainment in expectation of benefits from their counterparty. They should not also accept gifts or entertainment that could raise any suspicion of bribery.

[Sponsorship/Donation]

- Suppliers should not offer nor accept any sponsorships or donations when inappropriate intention is involved.
- Suppliers should take caution to ensure sponsorships/donations are not misused as a means of bribery, and provide them for just causes only.

## **5. Compliance with Fair Trade Laws, Anti-trust Laws, and IPR Laws**

Seegene complies with the laws and regulations of all countries where it operates. We

expect our suppliers to do the same by abiding by applicable laws and regulations, notably those associated with fair trade and anti-trust. Suppliers should not attempt to engage in any acts that may cause monopoly markets, such as price standardization, bid rigging and transaction restriction contracts entered into among competitors. Nor should they impede fair transactions by abusing their dominance. In addition, suppliers should proactively protect copyrights, patent rights, trademark rights and other forms of intellectual property rights (IPR). To this end, suppliers are required to abide by IPR laws and regulations under any circumstances.

- Suppliers should abide by anti-trust laws and fair trade laws.
- Suppliers should not engage in any act that could be misunderstood as price standardization, bid rigging or customer allocation.
- Suppliers should not engage in any action that may infringe upon the intellectual property rights of all its business partners, specifically Seegene.
- When identifying issues that may raise concerns, suppliers should proactively seek advice from legal experts to resolve such issues.
- When laws and/or regulations are breached, suppliers should immediately inform this to Seegene and faithfully cooperate with the investigations conducted by responsible authorities

## **6. Avoidance of Conflict of Interest**

A conflict of interest may take multiple forms. One prime example is when one of our suppliers enters into a contract with employees or customers of Seegene or public officials who may give rise to conflicts of interest in the sales and distribution of Seegene products. In this regard, our suppliers are expected to abide by the following.

- Suppliers should not employ or offer to employ individuals purchasing Seegene products or employees of Seegene customers while conducting business representing Seegene. Nor

should they engage in any monetary transactions under such circumstances.

- When a supplier employee is a customer of Seegene or has any public official in his/her family, suppliers should inform this to Seegene. If a supplier employee is involved in any relationships other than familial ones that may give rise to a conflict of interest, suppliers are obliged to inform this to Seegene.
- Suppliers should not pursue personal gains by way of the contractual relationship they forged with Seegene.
- Suppliers should introduce an internal control system to manage conflicts of interest.
- Upon identifying any conflict of interest, suppliers should immediately inform this to Seegene.

## **7. Prevention of Financial Crime**

Seegene hopes to put an end to any and all forms of inappropriate acts, including money laundering and terrorist financing, that may constitute financial crimes. To prevent such crimes, we do business only with those companies who satisfy regulatory requirements and our ethical standards. We perform detailed reviews on the financial structure of suppliers.

- Suppliers should sincerely respond to the inquiries made by Seegene concerning their financial and management structure, and provide necessary documents in a timely manner.
- Suppliers should manage their financial records accurately and transparently.
- Suppliers should fully investigate when it is suspected that their employees are involved in inappropriate business relationships. When an issue arises, they should immediately report this to Seegene and responsible governmental authorities.
- Suppliers should not instruct their employees to engage in any acts that may constitute financial crimes.

## **8. Data Privacy**



Seegene highly values trust with customers. Earning customer trust requires efforts to manage personal data. This is even more so in the healthcare industry where a high level of data privacy is essential. As such, our suppliers should develop full knowledge of and abide by the data privacy laws of countries where they operate.

- In collecting personal data, suppliers should specify the purpose of collection.
- Suppliers should establish an internal system to prevent the breach of personal data.
- When a data breach occurs in relation to Seegene, suppliers should immediately inform this to Seegene and promptly develop solutions.
- Suppliers should not provide personal data to third parties without prior consent.
- Suppliers should seek advice from legal experts when needed.
- Suppliers should not collect personal data beyond the intended purpose of collection.

## **9. Compliance with Import/Export Control Laws and Customs Regulations**

As Seegene serves customers across the globe, we have the obligation to abide by import/export control laws and customs regulations. Our suppliers are thus expected to understand domestic and cross-border cargo system and adhere to applicable laws and regulations. For exports, they should particularly keep current with the import regulations of importing countries. Extra care is needed for export/import regulations as they may impact the sales of software and/or technology as well as products.

- Suppliers should fully understand the latest export/import regulations and customs regulations of respective countries prior to conducting business.
- Suppliers should establish an internal management system to monitor the process of transporting products and technology.
- Suppliers should have declarations and/or permits issued when required for exporting products and technology.





## 10. Accounting Management

Suppliers should abide by accounting laws to maintain mutually trustworthy relationships with Seegene and employ accounting experts to ensure transparency in their accounting management. Furthermore, suppliers are obliged to communicate accurate and reliable information only to customers and investors. Any and all data that suppliers provide to Seegene or disclose to the general public should be truthful under any circumstances. Specifically, disclosures that contain false information could lead to criminal punishment.

- Suppliers should employ trustworthy accounting management personnel and establish an internal document management system.
- Suppliers should ensure that all of their disclosures and confidential documents contain truthful data only.
- Suppliers should recognize that false statements and document falsification constitute a serious offense subject to criminal punishment.

### **For Inquiries to Seegene**

If you have any inquiries concerning all our ethical regulations including this Code of Conduct, you should consult your company first and seek solutions according to its internal process. Upon witnessing any act that runs counter to this Code, supplier employees should report such act. Suppliers are obligated to do their utmost to protect the identity of the whistleblower and carefully investigate all incidents. When identifying any inappropriate act committed by Seegene employees or its agents, suppliers should immediately inform this to Seegene.

If you have any inquiries or issues to report to Seegene, please contact us through [winwinseegene@seegene.com](mailto:winwinseegene@seegene.com)