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Preamble

Our organization is committed to conducting business with integrity, accountability, and respect for people, communities, and the environment. Because third parties play an important role in supporting our operations and representing us in the marketplace, we expect them to uphold the same high standards of ethical conduct, regulatory and legal compliance.

This Code describes the minimum expectations for ethical behaviour, transparency, and responsible business practices for all third parties working with or on behalf of our organization. Third parties are expected to implement appropriate policies and controls, promptly raise concerns, and report any suspected misconduct, conflicts of interest, or non-compliance related to their engagement.

1. Purpose

The purpose of this **Third-Party Code of Conduct** ("Code") is to define the ethical, legal, and operational standards expected from **all third-party partners** engaged with our organization. As part of our commitment to responsible business practices this code outlines the minimum standards, principles, and expectations that all third parties including suppliers, distributors, contractors, consultants, and business partners must meet when conducting business with or on behalf of our organization.

This document establishes clear expectations for business integrity, safety, human rights protection, labour practices, environmental stewardship, and data responsibility across our value chain. It supports our organizational mission to operate ethically, sustainably, and in compliance with applicable laws and international best-practice frameworks.

By adhering to this Code, third parties contribute to a transparent, safe, and mutually respectful working relationship. Compliance with this Code is mandatory and failure to meet these requirements may result in corrective action, suspension, or termination of the partnership.

2. Scope and Applicability

This Code applies to **all third-party entities** that provide goods or services to, represent, or otherwise act on behalf of our organization. This includes, without limitation, suppliers and vendors (including raw materials, packaging, logistics, and IT), distributors and sales intermediaries, contractors and service providers, consultants, advisors, agents, brokers, outsourced staff, joint-working partners, and any other business partner engaged by or for our organization.

The requirements in this Code extend to the third party's employees, directors, temporary staff, and any subcontractors or sub-suppliers used to perform work connected to our organization. Third parties are responsible for communicating this Code (or equivalent standards) to their relevant personnel and ensuring

Author <u>Muhammad Mohsin</u> Jun 11 2026 3:53PM MUHAMMAD MOHSIN ERC Lead	Reviewed by <u>Mirza Muzammil Baig</u> Jun 11 2026 4:57PM MIRZA MUZAMMIL BAIG Country Patient Safety Head	Approved by <u>Fayyaz Ahmed</u> Jun 12 2026 3:29PM FAYYAZ AHMED RA Head Pakistan	Final Approval <u>Mehak Tahir</u> Jun 15 2026 11:00AM MEHAK TAHIR Quality Assurance Manager
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appropriate oversight, training, and controls to meet these expectations.

This Code applies to all business activities related to our products, services, operations, and supply chain, including interactions with government officials, healthcare professionals and organizations (where applicable), customers, patients, and other stakeholders. It covers activities performed on our premises, at third-party sites, and in the field, as well as work performed remotely or through digital channels.

In scope (examples include but not limited to):

- Third parties sourcing, manufacturing, packaging, storing, or transporting materials or finished products.
- Third parties supporting commercial, scientific, regulatory, quality, safety, pharmacovigilance, or clinical activities.
- Third parties handling personal data, confidential information, or systems access on our behalf.
- Any subcontractor engaged by the third party to deliver the contracted scope for our organization.

Our Standards & Requirements

3. Anti-Bribery & Anti-Fraud

Third Parties must not, under any circumstances, engage in bribery, corruption, fraud, or any related unethical practices. This includes offering, giving, requesting, or accepting anything of value to improperly influence a decision or obtain an unfair advantage. Third Parties must also ensure that no intermediaries such as agents, advisors, distributors, subcontractors, or any other business partners are used to carry out bribery or fraudulent activities on their behalf.

Third Parties shall not bribe any public official or private person and shall not accept any bribes. Third Parties are required to comply with all applicable anti-bribery, anti-corruption, and anti-fraud laws, regulations, and industry standards in every jurisdiction where they operate.

3.1 Facilitation Payments

Facilitation payments are **strictly prohibited** in connection with any business activities. Third Parties must not, under any circumstances, make, offer, request, authorize, or accept facilitation payments. This prohibition applies regardless of local customs, practices, or expectations. Where a Third Party faces pressure or solicitation for such a payment, they are expected to refuse the request, document the incident, and report it immediately through our appropriate reporting channels.

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3.2 Gifts, Hospitality & Entertainment (Improper Influence)

Third Parties must not directly or indirectly offer, give, request, or agree to provide any form of benefit including gifts, hospitality, entertainment, or other advantages, where such actions are intended to influence, or could reasonably be perceived as influencing, business decisions or outcomes in an inappropriate manner.

Third Parties are responsible for ensuring that **no third persons acting on their behalf**, such as agents, consultants, distributors, intermediaries, or affiliates, are used to carry out acts of bribery, corruption, or improper inducement. This obligation applies regardless of local business customs or practices.

3.3 Restrictions Related to Healthcare Professionals

Third Parties are strictly prohibited from providing gifts or benefits of any nature to healthcare professionals (HCPs) or to members of their immediate family. This restriction applies without exception and includes:

- Items intended for personal use
- Promotional or giveaway items, whether branded or non-branded
- Monetary gifts, cash payments, or cash-like instruments (e.g., gift cards, vouchers, prepaid cards)

Principles and Rationale

These requirements are grounded in widely recognized ethical principles and industry expectations that aim to:

- Safeguard independent and unbiased healthcare decision-making
- Avoid situations that could create actual or perceived conflicts of interest
- Promote transparency, trust, and responsible business conduct

3.4 Political contributions

The company prohibits political contributions and does not engage in such activities, directly or through third parties, in line with established policy requirements.

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3.5 Lobbying Activities

Where lobbying activities are undertaken, they must be conducted ethically and in compliance with applicable laws and regulations. Lobbying must not be misused for any illegal, unethical, or corrupt purpose, nor used to improperly influence decisions or secure undue advantage.

Integrity Expectations

All activities related to public policy engagement and government interaction must:

- Be accurate, transparent, and conducted in good faith
- Avoid conflicts of interest or the appearance of improper influence
- Uphold high standards of integrity and responsible business conduct

3.6 Public Officials and Ethical Interaction

As a matter of transparency and ethical conduct, Nouveaux applies the same standards of ethical behaviour to interactions with both private and public officials, while adopting more stringent policies, controls, and monitoring for engagements involving public officials.

The Third Party shall ensure that any interaction or relationship with public officials is conducted in full compliance with all applicable laws, regulations, and codes of conduct, including any requirements imposed by the public official's employer or governing authority.

The Third Party shall not offer, give, promise, or authorize any benefit or item of value to a public official unless such benefit is lawful, expressly permitted, appropriate, and directly linked to a legitimate business purpose. Any permitted benefit must be fully transparent, accurately documented, and properly recorded in the Third Party's books and records.

3.7 Fair Competition and Insider Trading

Fair Competition

The Third Party shall conduct its business in compliance with all applicable competition and antitrust laws and shall promote fair, independent, and lawful competition.

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The Third Party shall not engage in any conduct that restricts or distorts competition, including but not limited to price-fixing, bid-rigging, market or customer allocation, coordination with competitors, abuse of market position, or the improper exchange of competitively sensitive information.

The Third Party shall make all commercial decisions independently and shall avoid any agreements, understandings, or practices that may unfairly disadvantage customers, suppliers, or competitors.

Insider Trading

The Third Party shall comply with all applicable laws and regulations relating to insider trading and misuse of confidential or material non-public information.

The Third Party shall not use, disclose, or enable others to use confidential or price-sensitive information obtained through the business relationship to trade in securities or to gain any improper advantage. This prohibition applies regardless of whether trading is conducted directly or through another person or entity.

Any breach of this provision may result in remedial action, including termination of the agreement, without prejudice to other contractual or legal rights.

4. Human Rights and Labor Rights

Nouveaux is committed to conducting its business in a manner that respects the dignity, rights, and well-being of all individuals. The company seeks to prevent, address, and remediate adverse human rights impacts across its workplace, business activities, and the communities connected to its operations and value chain.

Nouveaux expects Third Parties to operate in a manner consistent with these values and to respect human rights and Labor rights in all aspects of their operations and business relationships.

4.1 Human Rights Due Diligence

Third Parties are required to implement reasonable and ongoing human rights due diligence processes proportionate to the nature and scale of their activities. This includes identifying, assessing, and addressing potential or actual human rights risks associated with their operations, products, services, and business relationships.

At a minimum, Third Parties must respect internationally recognized human rights, including those reflected in applicable country and global codes and principals of Human Rights and Labour Organizations widely accepted.

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Human rights due diligence should be an ongoing process through which Third Parties:

- Identify and assess potential and actual human rights risks
- Integrate findings into business decisions and implement appropriate mitigation measures
- Monitor the effectiveness of actions taken
- Communicate, as appropriate, how human rights risks are addressed

Where a Third Party causes or contributes to adverse human rights impacts, it is expected to take appropriate steps to support or participate in remedy.

4.2 Labor Rights

Third Parties must respect the basic rights of workers and provide working conditions that are safe, fair, and lawful. At a minimum, Third Parties must:

- Prohibit child labor and forced, bonded, or involuntary labor
- Respect workers' rights to freedom of association and collective bargaining, where permitted by law
- Provide wages, working hours, and benefits in accordance with applicable laws and regulations
- Ensure a workplace free from discrimination, harassment, abuse, or retaliation
- Provide a safe and healthy working environment and take reasonable steps to prevent workplace hazards

Third Parties must also comply with all applicable labor and employment laws in the countries in which they operate and maintain appropriate policies and controls to support compliance with these requirements.

5. Discrimination and Harassment

Nouveaux maintains a **zero-tolerance approach to discrimination and harassment** in any form.

Third Parties must provide a work environment that is respectful, inclusive, and free from discrimination, harassment, intimidation, abuse, or retaliation. Discrimination or harassment based on any legally protected or personal characteristic including but not limited to race, color, gender, gender identity or expression, age,

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nationality, ethnic origin, religion, disability, sexual orientation, marital status, or any other status protected by applicable law is strictly prohibited.

Harassment includes any unwelcome conduct, whether verbal, physical, visual, or psychological, that creates a hostile, intimidating, humiliating, or offensive environment.

Third Parties must:

- Implement policies and practices that prohibit discrimination and harassment
- Take prompt and appropriate action to address complaints or incidents
- Protect individuals who raise concerns in good faith from retaliation
- Ensure fair and respectful treatment of all workers

6. Fair Employment Practices

We expect Third Parties to apply fair, lawful, and ethical employment practices and to treat all workers with respect, dignity, and professionalism throughout the employment lifecycle.

Third Parties must ensure that employment decisions including recruitment, hiring, assignment, training, compensation, promotion, discipline, and termination are based on **merit, qualifications, and job-related criteria**, and are carried out in compliance with applicable labor and employment laws.

Third Parties must:

- Provide equal employment opportunities and fair treatment to all workers
- Promote inclusive and respectful workplaces free from discrimination and harassment
- Comply with applicable laws relating to wages, working hours, overtime, rest periods, and benefits
- Clearly communicate terms and conditions of employment in an understandable manner
- Respect workers' privacy and handle personal data responsibly and lawfully
- Ensure that disciplinary actions are fair, proportionate, and consistently applied
- Measures to ensure health and safety of employees.

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Retaliation against any individual who raises concerns, reports misconduct or participates in an investigation in good faith is strictly prohibited.

7. Health, Safety, Environmental Compliance & Sustainability

7.1 Health & Safety

Nouveaux is committed to protecting the health, safety, and well-being of all individuals affected by its operations. Third Parties are expected to provide a safe and healthy working environment and to manage health and safety risks responsibly.

Third Parties must:

- Comply with all applicable occupational health and safety laws, regulations, and standards
- Identify, assess, and manage workplace health and safety risks
- Implement appropriate controls, procedures, and training to prevent accidents, injuries, and work-related illnesses
- Provide safe working conditions, equipment, and emergency preparedness measures
- Promptly report, investigate, and address health and safety incidents

Third Parties shall not engage in practices that endanger workers, contractors, visitors, or communities.

7.2 Environmental Compliance & Sustainability

Nouveaux is committed to **respecting and protecting all forms of life** and applies the same expectations of care, responsibility, and ethical conduct toward humans, animals, and plants.

Nouveaux expects Third Parties to conduct their activities in an environmentally responsible manner and to comply with all applicable environmental laws, regulations, permits, and standards.

Third Parties must adhere to applicable laws and recognized good practices on animal welfare and ensure humane, ethical, and responsible treatment of animals at all times. Where activities involve the care, handling, or use of animals, Third Parties must comply with all applicable laws and recognized standards on animal welfare and take reasonable steps to ensure animals are treated humanely and responsibly.

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Third Parties must:

- Manage environmental risks associated with their operations, products, and services
- Comply with requirements related to emissions, waste handling, wastewater discharge, and hazardous materials
- Take reasonable steps to prevent pollution and environmental harm
- Use natural resources responsibly and promote efficient use of energy, water, and materials
- Support continuous improvement in environmental performance

Where reasonable and appropriate, Third Parties are encouraged to adopt sustainable practices that reduce environmental impact, support climate and resource conservation, and contribute to long-term environmental stewardship.

8. Data Privacy, Information Security & Artificial Intelligence

8.1 Data Privacy

Nouveaux is committed to respecting privacy and protecting personal data. Third Parties must process personal data in a lawful, fair, and transparent manner and in compliance with all applicable data protection and privacy laws and regulations.

Third Parties must:

- Collect, use, store, transfer, and retain personal data only for legitimate and specified business purposes
- Limit access to personal data to authorized individuals on a need-to-know basis
- Ensure personal data is accurate, relevant, and protected against unauthorized access or misuse
- Promptly report any actual or suspected data breach or privacy incident
- Delete or return personal data when it is no longer required, in accordance with legal and contractual obligations.

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8.2 Information Protection and Cybersecurity

Third Parties must protect confidential, proprietary, and sensitive information from unauthorized access, disclosure, alteration, or loss.

Third Parties are required to:

- Implement appropriate technical and organizational measures to ensure information security
- Protect systems and data against cybersecurity threats, including unauthorized access, malware, and data loss
- Safeguard Nouveaux information and assets throughout the duration of the business relationship and thereafter, as required
- Ensure that subcontractors or other parties with access to information meet equivalent security standards

8.3 Artificial Intelligence (AI) and Automated Systems

Where Artificial Intelligence or automated systems are used in connection with services provided to Nouveaux, Third Parties must ensure that such technologies are used responsibly, ethically, and in compliance with applicable laws and standards.

Third Parties must:

- Use AI systems in a manner that is lawful, transparent, and aligned with ethical principles
- Take reasonable steps to prevent bias, discrimination, or harm arising from AI-driven decisions
- Ensure appropriate human oversight over AI systems, particularly where decisions may affect individuals or their rights
- Protect personal, confidential, and sensitive data used in AI systems
- Maintain accountability for outcomes generated by AI or automated processes

9. High Quality Standards (Good Manufacturing Practices)

Nouveaux is committed to maintaining the highest standards of quality, safety, and compliance throughout its operations and value chain. Third Parties involved in manufacturing, packaging, testing, storage, distribution,

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or any quality-related activities must operate in accordance with recognized **Good Manufacturing Practices (GMP)** and applicable quality standards.

9.1 Quality and Compliance Requirements

Third Parties must:

- Comply with all applicable GMP requirements, regulatory standards, and quality-related laws in the countries where they operate
- Ensure that products, materials, and services consistently meet agreed specifications, quality attributes, and regulatory expectations
- Maintain an effective quality management system, including documented procedures, controls, and quality oversight
- Ensure personnel are adequately trained, qualified, and competent to perform assigned tasks
- Maintain accurate, complete, and reliable records that support product quality, data integrity, and traceability

9.2 Quality Systems and Controls

Third Parties are expected to:

- Implement appropriate controls for change management, deviations, investigations, and corrective and preventive actions (CAPAs)
- Ensure validated systems, processes, and equipment where required
- Manage suppliers and subcontractors in a manner that supports quality and compliance
- Promptly report any quality issues, deviations, non-conformances, or potential risks that may impact product quality, patient safety, or regulatory compliance

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9.3 Inspections, Audits, and Continuous Improvement

Third Parties must:

- Cooperate with audits, inspections, and quality assessments conducted by Nouveaux or regulatory authorities, as applicable
- Take timely corrective actions to remediate identified deficiencies
- Support continuous improvement initiatives to strengthen quality performance and compliance

10. Regulatory and Trade Compliance (Sanctions & Import/Export Regulations)

Nouveaux is committed to conducting its business in full compliance with applicable regulatory and trade laws, including economic sanctions and import/export regulations. Third Parties must ensure that all activities performed on behalf of, or in connection with, Nouveaux comply with these requirements in all relevant jurisdictions.

Third Parties must:

- Comply with all applicable sanctions, embargoes, import and export control laws, customs regulations, and trade compliance requirements
- Ensure that goods, services, software, technology, and technical information are not imported, exported, re-exported, transferred, or provided in violation of applicable laws or restrictions
- Conduct appropriate screening of customers, business partners, and transactions against applicable restricted or sanctioned party lists
- Obtain and maintain all required licenses, permits, approvals, and authorizations before engaging in controlled or restricted activities
- Maintain accurate, complete, and auditable records to demonstrate compliance with applicable trade and customs requirements

Third Parties shall not engage in transactions involving sanctioned or restricted countries, entities, or individuals, nor take any action intended to circumvent or evade applicable sanctions or import/export regulations.

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Any actual or suspected violation of sanctions or import/export requirements must be reported promptly. Failure to comply with this section may result in corrective actions, including suspension or termination of the business relationship, without prejudice to other contractual or legal remedies.

11. SpeakUp and Non-Retaliation

Nouveaux encourages open communication and is committed to fostering an environment where concerns can be raised responsibly and without fear.

Third Parties must provide a safe and accessible way for employees, contractors, and other stakeholders to **raise concerns, ask questions, or report suspected misconduct**, including potential violations of laws, regulations, contractual obligations, or Nouveaux standards.

11.1 SpeakUp Expectations

Third Parties must:

- Encourage individuals to speak up in good faith about concerns or suspected wrongdoing
- Ensure concerns can be raised confidentially and, where permitted by law, anonymously
- Take reported concerns seriously and address them promptly, fairly, and objectively
- Cooperate with any inquiries, reviews, or investigations related to reported concerns

11.2 Non-Retaliation

Retaliation of any kind against an individual who raises a concern, reports misconduct, or participates in an investigation **in good faith** is strictly prohibited.

Retaliation includes, but is not limited to:

- Dismissal or termination
- Demotion, loss of pay, or reduced work opportunities
- Harassment, intimidation, or discrimination
- Any other adverse or punitive treatment

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Third Parties must take appropriate steps to prevent retaliation and to address any retaliatory behaviour promptly and effectively.

Any failure to comply with these SpeakUp and non-retaliation requirements will result in corrective action, including remediation measures or termination of the business relationship, without prejudice to other contractual or legal remedies.

Any complains and concerns can be raised at speakup@nplpk.com

The SpeakUp channel of Novueaux is safe and confidential space to raise concerns, report unethical behaviour, or share any issues that may impact our values and compliance. **Every report will be handled with the utmost confidentiality, and you can use this channel without fear of retaliation.**

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