

Third Party Handbook

A third-party's guide to our
values and business practices

Team Consulting Limited has developed this handbook to identify our and our clients' basic values, which are to operate **ethically, honestly** and with **integrity.**

We aim to flow down the same values to all subcontractors, consultants, suppliers and other third parties (collectively 'Third Parties') that work for or on behalf of Team. This handbook is supplementary to any terms in which we have engaged your services.

Team are responsible for the acts of Third Parties working with us or on our behalf. That is why it is critical that Team are aware of who we are working with, the business practices they employ and the reputation they have for operating ethically and honestly.

We appreciate that you may have developed your own values and policies. However, we ask that you take the time to read ours and ensure that they align with your own. 01-T-147(v1.0)

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HEALTH, SAFETY AND THE ENVIRONMENT

Team carries out business in a responsible manner to ensure the health and safety of its own employees, others and the environment worldwide; we expect the same of Third Parties working with us or on our behalf.

Third Parties shall:

- Have an environment, health and safety (EHS) policy that confirms compliance with all applicable national and international EHS legislation and associated regulations.
- Show commitment to protect the health, safety and welfare of their employees and other people who might be affected by their activities.
- Provide and maintain safe and healthy working conditions, equipment and systems of work, and ensure safe storage and use of substances.
- Strive to prevent accidents and cases of work-related ill health by managing the health and safety risks in the workplace.
- Make available all safety information relating to hazardous materials.
- Ensure that their workforce is adequately trained and informed so that they are fully competent to provide products and services.
- Have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges.
- Have systems in place to prevent or mitigate accidental spills and releases into the environment.
- Ensure that all required permits, licenses and registrations are obtained, all statutory reporting requirements fulfilled, records of compliance documents maintained and kept up to date.

EMPLOYMENT PRINCIPLES

Team treats its employees appropriately based on internationally recognised employment and human rights standards.

Team aims to encourage, value and promote diversity and is committed to equality of opportunity for all employees.

Team is committed to making full use of all the talents of its employees and to providing a healthy environment which will encourage good and productive working practices within the organisation. We expect the same of Third Parties working with Team or on behalf of Team.

We require Third Parties to:

- Treat colleagues, clients and any person with respect and dignity at all times.
- Prohibit unlawful harassment and discrimination on the basis of an individual's race, colour, religion, sex, age, national origin, citizenship status, disability, sexual orientation, veteran status, or any other protected class.
- Ensure that decisions about recruitment, development and promotion are based purely on merit, performance and ability.
- Not use child labour (the minimum age for employment is 15 years old. If local minimum age law stipulates a higher age for work or mandatory schooling, the higher age applies).
- Not used force labour or involuntary prison labour.
- Pay employees according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.
- Have working hours that comply with national laws.
- Communicate with the employees the basis on which they are being compensated in a timely manner.
- Communicate with the employees whether overtime is required the compensation to be paid for such overtime.
- To respect the rights of employees, as defined in local laws, to associate freely, join or not join labour unions, seek representation and join employees' councils.

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

It is the policy of Team to conduct its business in an honest and ethical manner. Team take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. We request the same for Third Parties operating for us or on our behalf.

This policy does not prohibit gifts, entertainment or hospitality to or from third parties provided they fall within reasonable bounds of value and occurrence.

Third Parties under specific authorisation from Team may:

- Provide services and/or goods to Team or on Team's behalf.
- Provide items of appropriate value or hospitality.
- Participate in political activities.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage that is intended, or could be considered, as an incentive or reward for behaviour that is dishonest, illegal or a breach of a duty of impartiality, trust or good faith.

We request that Third Parties will never:

- Directly or indirectly offer, give or promise a bribe,

- or authorise anyone else to do so; and
- Directly or indirectly receive, solicit or agree to accept a bribe, or authorise someone else to do so.

Under no circumstances may Third Parties on Team's behalf:

- Give contributions.
- Give gifts of a personal nature (e.g. gift cards).
- Give any political support (e.g. finance or resources to political representatives).

Third Parties must declare and submit a written record of all gifts or hospitality accepted or offered.

Team do not make and will not accept facilitation payments or 'kickbacks' of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. We expect Third Parties working with us and on our behalf to take the same approach.

CONFLICTS OF INTEREST

Team does not allow any conflicts of interest to influence or compromise any of its professional duties and we request the same for Third Parties working with us or on our behalf.

Third Parties shall inform Team in writing at the time they become aware of any foreseeable, apparent, or actual conflicts of interest.

Third Parties shall not allow conflicts of interest to influence their independence or personal judgement in the conduct of Team's business.

Third Parties shall have financial controls in place to prevent conflicts of interest affecting procurement and financial decision making.

RESEARCH AND DEVELOPMENT ETHICS

Whilst undertaking research and development activities, Team must conduct high quality science that is delivered to ethical standards.

Third Parties working with us or on our behalf will comply with all national or state laws, regulations and recognised international quality and safety standards applicable. This includes, where applicable, bio-safety containment in all countries in which the Third Party operates.

PROTECTING INFORMATION

It is integral that confidential information belonging to Team or our clients is protected from loss or misuse.

Confidential information may include, but is not limited to, pricing or stock market sensitive data and statements; managerial information and statements of strategic intent; and intellectual property and expertise that gives Team and our clients a competitive edge.

We expect Third Parties to adhere to the confidential obligations in confidentiality agreements and our Terms and Conditions/ Terms of Engagement. If confidential information is shared, Third Parties must ensure that authorised communication is in confidence and limited to individuals who have a “need to know”.

Third Parties must prohibit their employees, agents, officers and subcontractors from using any confidential information for insider trading for their own or other’s personal profit.

DATA PROTECTION AND DATA PRIVACY

Team values the privacy of our employees, clients, participants in User Research Studies and Third Parties with whom we do business and are committed to the responsible collection, storage, use, transfer and disposal of their personal information and request that Third Parties working with us or on our behalf do the same.

All personal data must be processed in accordance with the applicable local laws and regulations and in a transparent and secure manner. Personal data is any information about an identified or identifiable natural person.

Third Parties working with us or on our behalf shall only use the personal data of Team, our clients and our participants in User Research Studies under our strict instructions and not use it for their own purposes.

If recruiting on our behalf, appropriate written consent in line with General Data Protection Regulation (GDPR), Data Protection Act 2018 and any other applicable privacy laws, must be obtained.

Third Parties are expected to have effective organisational and security measures in place to ensure the privacy of personal data and only use the personal data for the purpose it was collected.

Third Parties must ensure that personal information is protected and kept secure at all times from unauthorised use, damage, disclosure, removal, whether through accident, improper act or breach of trust.

Third Parties shall notify Team for any suspected or actual data breach concerning the services undertaken within 24 hours. Third Parties shall appropriately assist Team in any investigations in response to a data or information breach.

Third Parties must have a nominated representative in their company to act accountably for data protection, privacy and security.

Third Parties shall ensure that their employees who have access to personal data are appropriately trained in their responsibilities around processing and protecting the personal data.

Third Parties must have adequate safeguards, rules and procedures to ensure that they remain in compliance with all applicable laws that govern cross border data transactions.

WHISTLE BLOWING (PUBLIC INTEREST DISCLOSURE) POLICY

Whistleblowing is when an individual knows or suspects that there is some wrongdoing occurring within the organisation and alerts the employer or the relevant authority accordingly.

The Public Interest Disclosure Act 1998 gives protection to individuals, employees, casual workers, agency workers and contractors who make a qualifying disclosure when they reasonably believe it is in the public interest for them to do so.

If you know or suspect that some wrongdoing is occurring within Team or within your own organisation, you should raise the matter immediately.

Although this list is not exhaustive, examples of situations in which it might be appropriate for an individual to report a wrongdoing include:

- A breach or potential breach of health and safety legislation
- Financial irregularities
- Harassment of a colleague, customer or other individual
- Damage to the environment
- The committing of a criminal offence
- An act of bribery
- Deliberate concealment of any of the above

We would expect Third Parties working with and on behalf of Team to follow these practices within their own business.

PRODUCT COMMUNICATION

Team adheres to ethical standards when providing product information. We expect Third Parties working with us and on our behalf to comply with ethical standards in relation to Team, or our clients' product information.

Product information includes any information, activity or material, promotional or non-promotional, designed to inform health care professionals and organisations, patients, investors, the media and others about the characteristics and use of our products or our clients' products.

Team expect that Third Parties working with us or on our behalf shall only provide information, whether written, in person or through any other medium, about us or our clients' products when authorised to do so.

Third Parties must promote Team and Team's clients' products in an ethical, balanced and fair way and shall only use promotional or other product information that has been approved in writing by Team.

Third Parties must not engage directly with consumers/patients unless authorised by Team and in accordance with local laws.

PRODUCT SECURITY

Team and Third Parties working with us or on our behalf must conduct a secure end-to-end supply chain that will prevent counterfeiting, theft or illegal trade of our products or our clients' products.

Illegal trade refers to illegally traded, diverted, fraudulently traded, tampered with and/or stolen medicines. Counterfeit means medicines that have been deliberately and fraudulently mislabelled with respect to identity or source.

We expect Third Parties not to be involved in any activity relating to counterfeit or illegally traded medicines.

Third Parties must inform Team in the event or possible event of any incident related to illegally traded or counterfeit medicines in a timely manner.

Third Parties shall, at the request of Team, provide reasonable co-operation and assistance in relation to any investigation that Team or our clients may introduce.

Third Parties shall provide a secure environment for all activities relating to Team or our clients' products and take all necessary steps to ensure the authenticity through the supply chain. This includes procedures and records for traceability of finished products, but also any waste, surplus, returned or discarded products.

TRADE CONTROLS AND COMPETITION

Neither Team nor our Third Parties shall be involved in unfair or anti-competitive business arrangements and shall only engage in importing, exporting and all other forms of trade in a legal and ethical manner.

Third Parties must comply with applicable trade regulations including licensing requirements, boycotts, embargoes and other trade restrictions that have been authorised by recognised national and international authorities.

Team expects that Third Parties shall only seek competitive advantage through lawful means and must conduct business consistent with fair and vigorous competition.

Third Parties shall only engage in a dialogue with competitors when there is a legitimate business reason to do so, and the dialogue is such that it will not restrict competition.

Third Parties must not abuse their position, if it is dominant or has a monopoly, to exclude competitors or exploit customers.

If you would like further information on the areas covered in this handbook, or if at any time you may foresee or come across an event which may or appears to violate a policy referred to in this handbook, you are strongly encouraged to promptly report the details of such an event to Team's Contracts Department.

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