

# Code of Conduct

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Biotage offers efficient separation technologies from analysis to industrial scale and high-quality solutions for analytical chemistry from research to commercial analysis laboratories. Biotage's products are used by government authorities, academic institutions, pharmaceutical and food companies, among others. The company is headquartered in Uppsala and has offices in the US, UK, China, Japan, South Korea, India and Singapore. Biotage has approx. 700 employees. Biotage is listed on the NASDAQ Stockholm stock exchange. Website: [www.biotage.com](http://www.biotage.com)

## 1 Purpose

The operations are based on close and long-term relationships with customers, suppliers, and other business partners, and we want to be a trustworthy, longterm and reliable partner. Besides commercial goals and principles, the business operations should also be conducted with high standards of integrity and ethics. We thus attach great importance to acting in a professional, honest and ethically correct manner which is described in this document.

## 2 Scope

We support the lines of thought in the UN's Global Compact ([www.globalcompact.org](http://www.globalcompact.org)), the ILO's core conventions, ([www.ilo.org](http://www.ilo.org)), as well as the OECD's Guidelines for Multinational Enterprises ([www.oecd.org](http://www.oecd.org)) and these principles are the inspiration for our Code of Conduct. Our long-term goal is that all partners and suppliers of our companies should comply with the Code of Conduct. However, we understand that some changes require time, but we expect continuous efforts towards improvements. As a minimum, we comply with all prevailing laws and regulations and when necessary, we will also introduce standards that follow this Code where existing laws and regulations are not in line with its objectives. We expect as a minimum requirement that customers and suppliers have knowledge of and comply with current legislation. The Managing Director

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of each individual company in the Group is responsible for ensuring that the day-to-day work is conducted in accordance with our Code of Conduct and each employee is responsible for adhering to the Code of Conduct. This is the governing policy with respect to business ethics. Details related to Anti-Bribery and Corruption, Whistleblowing, Global Work Environment and Modern Slavery and Human Trafficking is described in separate policies as well as business ethics towards suppliers is described in our Supplier Code of Conduct.

### **3 Policy**

#### **Relations with the Community**

Each company within the Biotage Group strives to have a positive influence in the communities where the company operates. Business decisions that may be considered to have an impact on the wider community shall as far as possible always be preceded by, or promptly followed by, discussions with community representatives for the purpose of identifying possible need for collective measures.

#### **Political Involvement**

We maintain neutrality in relation to political parties and candidates. Neither the name Biotage, nor any resources under the control of group companies shall be used to promote the interests of political parties or candidates.

#### **Anti-corruption**

We do not accept corruption, bribes, or unfair methods of competition. Biotage complies with the Swedish Business Code issued by the Swedish Institute Against Bribes (IMM), which aims to guide companies in questions of how gifts, remuneration and other benefits may be used in the business sector to promote the company's operations. All sales and marketing of our products and services shall also take place in accordance with the relevant laws and regulations in each country. We shall not offer or make improper payments or pay other remuneration to any person or organization for the purpose of establishing or retaining business relationships with Biotage. We shall not, directly, or indirectly, ask for or accept any form of improper payment or other remuneration which is provided for the purpose of establishing or retaining business relationships with Biotage.

#### **Working Conditions**

We strive to be a respected employer. Biotage should provide a good working environment and strive to be an attractive employer when it comes to the employees' professional development. The relationship with and between employees should be based on mutual respect and allow reasonable influence in areas that impact on the individual's work situation. We aim to ensure that all customers and suppliers comply with the same basic principles as Biotage, which are described below:

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## Working Environment

We offer a pleasant workplace and look after our employees' health and ensure their well-being and development. This means that in design of workplaces, equipment, behavior in relation to each other, job descriptions, skills development and in all other work environment-related questions, that we work to ensure that our employees shall have a work environment and work situation that prevents physical and mental ill health and that promotes well-being and development. Our employees' health and safety shall be prioritized, and appropriate protection shall be used – the equipment and buildings used shall be safe, and hazardous substances and waste shall be handled in a secure manner.

## Equality

We strive to ensure that employees at Biotage shall be offered equal opportunities for career advancement, training, remuneration, work content and working conditions, regardless of gender. In those cases where remuneration gaps exist between men and women, we should actively work to adjust them and bridge the gap. We also work to achieve a more even gender breakdown in recruitment.

## Discrimination

We offer equal employment opportunities regardless of race, religion, gender, disability, family circumstances or sexual orientation. We work to counter all forms of discrimination at the workplace or in dealing with employees when it comes to setting salaries and career advancement. We strive to introduce appropriate processes for discovering and remedying each case of discrimination.

## Other Working Conditions:

Employees should be treated with respect and dignity. No employee should under any circumstances be subject to physical punishment or other forms of physical, sexual, psychological punitive measure, harassment, or coercion. We do not accept any form of forced labor, involuntary or unpaid work. The UN's Convention on the Rights of the Child, the ILO's Convention on the Minimum Age for Employment, and the Convention on Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor, are guidelines for all business activities that are conducted in our name. Employees should have the freedom to exercise their legal right to be a member of, organize or work for organizations that represent their interests as employees.

## Environment

Recycling considerations and economizing on natural resources are an important basis of our business operations. The environmental perspective should be part of every important decision, with the aim of creating long-term value for Biotage customers, employees, shareholders and for the wider community. The environmental work shall also be conducted within the framework of our business concept and should be well-integrated in our operational work. By extension, this means that the entire life cycle of the products and services we supply should be taken into consideration. We can take a

holistic view of environmental issues through our highly skilled employees and by continually developing our know-how regarding environmental impacts.

Measures to improve the environment should be taken as far as technically possible, commercially reasonable, and environmentally motivated. Customers and suppliers are expected to be familiar with and meet requirements under national legislation, regulations, and industry standards.

Customers and suppliers as a minimum requirement should ensure safe handling of hazardous substances and waste.

## Information

### Operations

All information concerning our business with customers and suppliers is confidential, as all information about our employees and our internal affairs. For instance, this applies to information that there is or has been a relationship between us and a customer/supplier. Information about services and products that customers/suppliers buy, or sell is also confidential unless anything else has been agreed.

### Employee Involvement Outside Biotage

Involvement in external activities shall be reported to and approved by the immediate manager. Examples of such activities are if employees at Biotage accept employment outside Biotage (part-time or full-time), are on the board of directors or similar body of another company or different organization or conduct business activities of another kind.

### Financial Reporting and Accounting

All financial reporting and accounting shall be maintained and reported in accordance with local regulations (GAAP) and IFRS. All reporting shall provide information which is of assistance and useful for users. All assets, liabilities, revenue, costs, and operations shall be described in a correct manner.

### Social Media

At our workplaces, most of us have access to the Internet and social media. They are — in the same way as the telephone and email — tools for our work and are intended for communication in a business context. Employees who in their professional capacity communicate using social media always represent their company and Biotage. Therefore, all communication must be aligned with our values and be consistent with how we communicate in other channels. As employees we also must draw a clear distinction between a private and professional presence on the Internet and on social media.

## Implementation

### Communication

We have an open attitude in the dialogue with those who are affected by Biotage operations. We answer questions from outsiders and communicate with the parties concerned in a correct and effective way. Questions may be sent via email to [info@biotage.com](mailto:info@biotage.com).

### Scope

Managers and leaders at Biotage should be familiar with and be responsible in their area for ensuring compliance with this Code of Conduct and with relevant national laws and regulations. The Managing Director of each individual company in the Group is also responsible for ensuring that each company's main customers and suppliers are familiar with the Code of Conduct and the Supplier Code of Conduct. All employees at Biotage are responsible for ensuring that they personally act in accordance with the values and commercial principles of the Code of Conduct. The Group Management of Biotage is responsible for the continuous work surrounding the Code of Conduct.

### Follow-up

Each employee at Biotage is responsible for reporting possible cases of fraud or other criminal behavior to the Group Management, but other deviations from the Code of Conduct should also be reported. Confirmed violations of our Code of Conduct may result in disciplinary measures. Employees who are uncertain as to whether specific conduct can contravene this Code of Conduct should consult with their immediate manager.

### Responsibility for Employees

The Managing Director of each individual company in the Group is responsible for communicating the content and purpose of this Code of Conduct in their organization and for encouraging employees to report matters that may conflict with these rules. Reports of violations of this Code of Conduct may be submitted anonymously and confidentially through our Whistleblowing form on the intranet first page or via post to Biotage AB, Box 8, SE-75103 Uppsala, Sweden. You can also use our e-mail address [hotline@biotage.com](mailto:hotline@biotage.com), which is a non-confidential channel where the e-mail goes to the CEO, the CHRSO and the Chairman of the Board. No penalty or other negative consequences shall apply to persons who submit a report in good faith.

## 4 Document information

### 4.1 References

SC031	Supplier Code of Conduct
POL-0014	Whistleblowing Policy
POL-0015	Anti-Bribery and Corruption Policy
POL-0016	Global Work Environment Policy
POL-0017	Modern Slavery and Human Trafficking Statement

## 4.2 Terms/Abbreviations/Definitions

General Definitions/acronyms are defined in the Global Document “*Biotage Glossary of Terms*”

Document specific terms and abbreviations are listed in the following table:

<b>Term / Abbreviation</b>	<b>Definition</b>
CEO	Chief Executive Officer
CHRSO	Chief Human Resources and Sustainability Officer
UN	United Nations
ILO	International Labour Organization
OECD	Organisation for Economic Co-operation and Development
GAAP	Generally Accepted Accounting Principles/Practices
IFRS	International Financial Reporting Standards

## 4.3 Version history

<b>Version</b>	<b>Changed by</b>	<b>Date</b>	<b>Changes</b>
<b>1.0</b>	Cecilia Hållner	2017-11-22	First edition
<b>2.0</b>	Petra Duprez	2020-11-19	Second edition
<b>3.0</b>	Petra Duprez	2023-12-06	Third edition