

April 2022

SUPPLIER CODE OF CONDUCT

Dear Business partners,

Bluefish Pharmaceuticals is committed to sustainable business practices. We strive to be ethical and transparent in all our business transactions and treat our customers, colleagues and suppliers with fairness and respect. Our values are Customer Service, Responsibility & Accountability, Act Smart, Simplicity & continuous Improvement, Empowered Organisation.

We choose to work with business partners who align with our values and share our commitment to follow the highest ethical standards in business transactions. We require that our Suppliers strive to achieve best practices to create a sustainable work environment for years to come.

We cannot cover every situation that may arise in this Supplier Code of Conduct, so we ask that you, as our supplier, be thoughtful and ethical. This Supplier Code should be viewed as the minimum standards that we expect from our supplier community. It is not intended to reduce, replace, or limit any other legal or contractual obligations that you have to Bluefish.

We encourage you to bring your questions, suggestions, and complaints to our attention. Careful consideration will be given to each of these in our continuing effort to improve operations at Bluefish Pharmaceuticals

We look forward to a long and successful partnership with you and your team and thank you for supporting and maintaining the legacy of integrity we have created at Bluefish.

Warm regards,



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CEO



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Business Integrity and Ethics

Suppliers shall conduct their business in an ethical manner and act with integrity. Bluefish Pharmaceuticals expect its suppliers to comply with all legal and regulatory requirements regarding ethics including:

Prevention of conflicts of interest

Supplier's employees must act solely in the interest of their company and must refrain from having any personal interest or benefiting from their position to obtain advantages for themselves or for third parties. Bluefish Pharmaceuticals expects its suppliers to disclose any conflict of interest to let us take the appropriate action.

Corruption and influence peddling

Suppliers must comply with all applicable anti-corruption regulations. Our suppliers will fully comply with all anti-bribery laws in place. They will not engage in illegal or unethical practices and will not accept business if it requires giving or receiving a bribe or accepting any other form of extortion or corruption. Our suppliers will put the appropriate procedures in place to avoid corruption at all times.

Privacy and data protection

Our suppliers will respect the privacy of all individuals and the confidentiality of the personal data they hold about them. Suppliers shall always use personal data (e. g. from employees or customers) appropriately for necessary business purposes only and protect it from misuse. They will comply with all applicable laws regarding the collection, use and disclosure of personal data.

Respect for the principles of free competition

Our suppliers shall conduct business competitively and in full compliance with applicable laws, codes and regulations.

Sub-suppliers and Subcontractors

Our suppliers shall have a program to support compliance by their own suppliers and subcontractors (including, without limitation, any intermediaries, agents, manufacturers' representatives, distributors or any other business partners) with the standards set forth in this Code.

Labor & Human Rights

Suppliers must treat all their employees with respect and dignity, strictly comply with all applicable labor laws and regulations and promote workplace diversity, equality and inclusion.

Forced labor

Bluefish Pharmaceuticals requires its Suppliers to not use forced, bonded, indentured or involuntary prison labor.

Child labor

Our suppliers are expected to adhere to International Labor Organization (ILO) standards in their business operations in fighting any form of child labor. Suppliers are expected to have adequate and verifiable mechanisms for age verification in recruitment procedure.

Respect and dignity

Bluefish Pharmaceuticals expects its Suppliers to treat their employees with respect and dignity and strictly forbid any form of physical violence, psychological violence, threat of physical violence, sexual abuse, physical or psychological harassment, and any other form of intimidation.

Discrimination

Bluefish Pharmaceuticals supports diversity and employment equity. Suppliers are expected to offer equal employment opportunities, remuneration, professional promotions or disciplinary measures without regards on the ethnic, origin, religion, nationality, age, gender, disability, political convictions or physical appearance... (non-exhaustive list).

Mechanism for Reporting Concerns

Our suppliers shall provide means for their employees to report concerns or potentially unlawful activities in the workplace without threat of reprisal, intimidation or harassment. If concerns are reported, suppliers will investigate and take corrective action where needed. Suppliers will not tolerate retaliation against their employees for reporting concerns in good faith.

Health & Safety

Bluefish Pharmaceuticals requires its Suppliers to guarantee optimal health and safety conditions for their employees. At a minimum, the Supplier must comply with all applicable health and safety laws, regulations and standards. Health and Safety measures shall extend to contractors and subcontractors on supplier's sites.

Worker Protection

Our suppliers shall protect workers from over exposure to chemical, biological, physical, and radiological hazards as well as excessive physical or psychologically demanding tasks in the workplace. Suppliers shall ensure appropriate housekeeping and provide workers with access to potable water and sewer/septic and waste disposal facilities.

Hazard Information

Safety information relating to hazardous materials, including pharmaceutical compounds and pharmaceutical intermediate materials, shall be available to educate, train and protect workers from hazards. Such safety information shall be available in written documents, such as Safety Data Sheets (SDS) in languages commonly used by the supplier's workforce.

Suppliers shall ensure appropriate communication to other business partners in the value chain, as appropriate, including Bluefish and its logistic and distributor partners, to ensure hazards are appropriately disclosed and managed.

Process Safety

Our suppliers shall have programs in place to identify the risks from chemical and biological processes and to prevent, mitigate or respond to catastrophic events, including but not limited to releases of chemicals or biological agents, fires, and explosions.

Emergency Preparedness and Response

Our suppliers shall identify and assess emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures.

Physical and Mental Wellbeing

Our suppliers shall provide a culture that promotes physical and mental well-being to help workers live healthy, full and productive lives.

Environment

Suppliers should operate in an environmentally responsible and efficient manner, minimizing adverse impact on the environment. Suppliers are encouraged to preserve natural resources, avoid the use of hazardous materials and engage in activities that reuse and recycle.

Environmental authorizations

Suppliers should comply with all applicable environmental legislation, regulation and standards. All required environmental permits, licenses, registrations and reporting to authorities should be obtained, and all operational and reporting requirements shall be followed.

Waste and Emissions

Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled, disposed of or adequately treated prior to release into the environment.

Spills and Releases

Suppliers shall have systems in place to prevent and mitigate accidental spills and releases to the environment. Vendors shall provide a safe and healthy working environment, including for any company-provided living quarters.

Resource Efficiency

Suppliers shall take measures to improve efficiency and reduce the consumption of resources, including conserving energy, reducing water consumption in areas of water stress and scarcity, and increasing the amount of waste and water reused and recycled.

Sustainable Practices and Processes

Suppliers shall carry out due diligence on the source of critical raw materials to promote legal and sustainable sourcing. This requirement should also be pushed further up the supply chain through to their vendors.

Climate

Suppliers shall demonstrate that they are committed to reducing greenhouse gas emissions from their own operations and minimizing their impact on climate change.

Management Systems

Our suppliers shall use management systems to facilitate continual improvement and compliance with the expectations of these principles. The management system elements include:

Business Continuity

Suppliers are responsible for the development and implementation of appropriate business continuity plans for operations supporting Bluefish business. These plans should be designed and kept current to promptly recover and restore partially or completely interrupted critical functions to minimize disruption to Bluefish's business and protect Bluefish's reputation.

Commitment, Accountability and Risk Management

Suppliers shall demonstrate commitment to the concepts described in this document by allocating appropriate resources. Suppliers shall have mechanisms to determine and manage risks in all areas addressed by this document.

Continual Improvement

Suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.

Training and Competency

Suppliers shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to address these expectations.