



## REPLIGEN CORPORATION

### BUSINESS PARTNER CODE OF CONDUCT

April 2021

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*Effective April 2021*

Repligen Corporation ("Repligen") believes corporate responsibility and sustainability go hand-in-hand. We take our responsibilities to our employees, customers, stakeholders and business partners seriously, as well as to our natural resources and society. We are dedicated to operating with uncompromising integrity and respect, and in compliance with all applicable legal and regulatory standards.

As a signatory of the UN Global Compact, we are committed to implementing its Ten Principles in the areas of Human Rights, Labor, Environment and Anti-Corruption principles.

This Business Partner Code of Conduct ("Code of Conduct") reflects the principles under which Repligen operates, and we expect each of our suppliers, manufacturers, distributors, vendors, service providers, permitted subcontractors, dealers, contract partners, sales representatives, brokers, advisers and their staff, agents and representatives (each a "Business Partner" and collectively "Business Partners") to adhere to the same principles.

The minimum standards for these principles that we expect to be met by all Repligen Business Partners are included in this Code of Conduct.

Business Partner shall comply with all applicable laws, regulations, rules, guides, ordinances, and standards. Where this Code of Conduct requires Business Partner to meet a higher standard than set out by law or regulation, we expect Business Partner shall meet such higher standard.

### **Integrity and Compliance**

Business Partner must maintain the highest standards of integrity and ethics in conducting its business.

- Integrity. Business Partner will not engage in corruption, extortion or embezzlement, offer or accept bribes or unlawful incentives or employ any other means to obtain an undue or improper advantage, particularly in business transactions with third parties or public officials. Business Partner must comply with all applicable anti-corruption laws and regulations of the countries in which it operates, the U.S. Foreign Corrupt Practices Act, the UK Anti-Bribery Act, the OECD Anti-Bribery Convention, and all international anti-corruption conventions. Furthermore, Business Partner shall not influence Repligen employees in their decisions to award contracts by giving them or related parties unlawful gifts, bribes, improper payments or kickbacks. Business Partner must immediately report to Repligen any circumstance where an officer, director, employee, representative or agent of Repligen or any of its affiliates has made any such improper request or demand of the Business Partner.
- Trade Regulations. Business Partner shall comply with all export and import control regulations as well as other applicable commercial and customs regulations.

- Fair Competition. Business Partner shall conduct business in line with fair competition and in accordance with all applicable laws concerning fair competition. Business Partner shall uphold antitrust laws and shall not engage in anticompetitive practices such as price fixing and market sharing agreements.
- Conflicts of Interest. Business Partner shall avoid interactions with Repligen employees or their relatives and related parties that might conflict with or appear to conflict with the interests of Repligen. Any relationship or kinship with Repligen employees that could constitute a conflict of interest must be disclosed.
- Fiscal Responsibility. Business Partner shall keep accurate and complete financial and operational records as well as maintain a system of effective internal controls.
- Responsible Sourcing. Repligen supports responsible sourcing practices, which includes compliance with the Conflict Minerals provision of the Dodd-Frank Act. Business Partner shall design and implement reasonable processes to ensure no products, including minerals, supplied to Repligen originate from a conflict region where they contribute directly or indirectly to the funding or support of armed groups or to human rights violations.
- Confidential Information, Intellectual Property & Data Protection. Business Partner shall treat Repligen intellectual property and all confidential information, including personal data collected, stored, and processed for or by Repligen, in an appropriate and responsible manner within the scope of the applicable statutory or contractual provisions, and take all necessary protective measures to prevent its misuse, theft, fraud, unauthorized access, disclose or modification. The transfer or sharing of technology or expertise must be effectuated in a manner that protects intellectual property rights and complies with applicable legal and contractual provisions.
- Animal Welfare. Business Partner shall minimize any experiments involving animals, and where necessary to use animals, minimize both the number of animals involved and minimize the suffering and stress to each animal.
- Reporting Violations, Non-Retaliation. Business Partner shall provide all employees with transparent, fair, accessible and confidential procedures to report grievances or concerns including potentially unlawful or unethical activities in the workplace. Business Partner shall investigate such reports and take corrective action if needed. Business Partner shall not retaliate against any employee who makes a good faith report or who assists in the investigation of any report.

## **Human Rights, Labor and Employment**

Business Partner shall conduct its activities in a manner that respects human rights, and comply with all applicable labor and employment laws, rules and regulations.

- Child Labor. Business Partner shall employ only workers who meet the applicable minimum legal age requirements and avoid child labor. The term “child” refers to any person under the age of 16 (or 14 according to the applicable local laws), any person under the minimum age for completion of compulsory education or any person under the minimum age for employment in any particular country. Business Partner shall comply with all applicable child labor laws, including those related to hiring, wages, hours worked, overtime and working conditions.
- Forced Labor / Prison Labor, Human Trafficking, and Slavery. Business Partner will not use forced, compelled or involuntary labor, including slave, prison, indentured, or bonded labor. Business Partner must not engage in or condone the trafficking of workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. All work must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice.
- Legal Authorization. Business Partner shall only employ workers who are legally authorized to work in their facilities and is responsible for validating workers’ eligibility to work through appropriate documentation.
- The Right to Collective Bargaining and Freedom of Association. To the extent permitted by local law, Business Partner shall allow and not interfere with their employees to associate with groups of their choice, including the right to join unions and worker representative groups, and to bargain collectively. Employees who are members of a union or a worker representative group shall neither be treated preferentially nor be disadvantaged.

## **Fair and Equal Treatment**

Repligen believes all workers deserve an equal chance to succeed based on their hard work, talent and commitment, and should always be treated with fairness, dignity and respect.

- Working Hours and Compensation. Business Partner shall maintain work hours in compliance with all applicable laws and regulations. Business Partner shall comply with all applicable wage and hour laws and regulations, including those relating to minimum wage, overtime, holidays and paid time off, and other elements of compensation, and must provide all legally mandated benefits. We expect employees to be offered fair, competitive remuneration and equal pay for work of equal value. Business Partner shall pay employees in a timely manner.
- Fair and Equal Treatment. Business Partner shall treat all workers with respect and dignity. Business Partner will not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, psychological abuse, verbal harassment, physical coercion or any other form of intimidation.

- Non-Discrimination. Business Partner will not unlawfully discriminate against any worker in its hiring and employment practices on the basis of race, ethnicity, physical characteristic, sexual orientation, gender identity, marital status, maternity or parental status, union membership, political affiliation, color, age, gender, national origin, health, disability, religion or any other legally protected characteristics. Business Partner shall ensure a harassment-free environment.
- Privacy. Business Partner shall respect the privacy rights of its workers when gathering private information or implementing worker monitoring practices.

## **Environmental**

Business Partner shall comply with all applicable environmental laws, environmental regulations and recommendations for environmental protection.

- Environmental Protections. Business Partner shall seek ways to conserve natural resources and energy, reduce waste, air emissions, wastewater discharge and the use of hazardous substances, and minimize adverse impacts on the environment.
- Environmental Permits & Reporting. Business Partner shall ensure it obtains, keeps current, and follows the reporting guidelines of all the required environmental permits, licenses and registrations to be at any time legally compliant.
- Hazardous Materials & Product Safety. Business Partner shall identify hazardous materials, chemicals and substances, and ensure their safe handling, movement, storage, recycling, reuse and disposal. Supplier shall comply with material restrictions and product safety requirements set by applicable laws and regulations. Suppliers shall ensure that key workers are aware of and trained in product safety practices.

## **Health and Safety**

Business Partner shall comply with all applicable health and safety laws, rules and regulations and is encouraged to exceed those minimums whenever possible.

- Workplace Environment. Business Partner shall provide employees a safe, healthy and sanitary working environment by meeting, and endeavoring to exceed, international safety standards. Business Partner shall implement a health and safety management system that complies with the relevant legal regulations. Facilities must be constructed and maintained in accordance with the standards set by applicable laws and regulations.
- Training. Business Partner shall provide employees procedures and trainings, tailored to the employees' work, on occupational health and safety, injury and illness reporting systems and medical treatment.

- Operation and Maintenance. Business Partner shall have necessary support and processes in place to ensure safe operation and adequate maintenance of all equipment. Emergency Preparedness. Business Partner shall be prepared for emergency situations. This includes worker notification and evacuation procedures, emergency training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, and adequate exit facilities. The Supplier shall regularly train workers on emergency planning procedures and readiness.
- Business Continuity. Business Partner shall ensure the development and implementation of a suitable plan for the continuity of operational processes affecting its business activities with Repligen.

### **Management Systems, Monitoring Compliance and Reporting**

- Management Systems. Business Partner shall have management systems in place to ensure compliance with, mitigate the risks identified in, and facilitate continuous improvement with respect to this Code of Conduct.
- Monitoring & Compliance. Business Partner shall maintain all documentation necessary to demonstrate compliance with this Code of Conduct and will provide Repligen access to such documentation upon request of Repligen. Business Partner acknowledges that Repligen may in its discretion conduct audits, including on-site facility inspections and books and records review, to verify Business Partner's compliance with this Code of Conduct.
- Non-Compliance Consequences. Business Partners that do not conform to the standards set forth in this Code of Conduct may have their business relationship with Repligen or the applicable Repligen affiliate terminated. Repligen does not assume a duty to monitor or ensure compliance with this Code of Conduct and Business Partner understands that Business Partner is solely responsible for full compliance with this Code of Conduct by its officers, directors, employees, representatives and agents.
- Reporting Non-Compliance. Business Partner must immediately notify Repligen at upon learning of any known or suspected improper behavior or violation of this Code of Conduct by Business Partner or by employees of Repligen.
  - Business Partner may *anonymously* register a concern by our phone and internet-based Compliance Hotline. These avenues are independently managed by a company called NAVEX Global.
  - Reports of suspected or potential violations will be investigated. A Business Partner violation of our Code can result can impact Repligen's relationship with that party including termination of the relationship.

## Contacts for Reporting Non-Compliance with this Business Partner Code of Conduct

### Repligen internal contact

- General Counsel and Chief Compliance Officer, currently **Squire Servance**

### Compliance Hotline Access by Phone:

- US Based Business Partners: Dial **844-945-0213**
- Ex-US Business Partners: First dial codes required for dialing to the United States, dial **844-945-0213**

### Compliance Hotline Access by Internet:

- All Business Partners Follow directions at <https://iwf.tnwgrc.com/repligen>