



The Employee Owned Biostatistics CRO

## PLUS-PROJECT SUPPLIER CODE OF CONDUCT

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Version Control Table

Version	Date of Version	Signed	Reason for Change	Areas Changed
1.0	13 March 2024		Initial version	N/A
2.0	27 March 2024		New template	Content unchanged
3.0	15 May 2025		New logo and review	Cross reference to Plus-Project Human Rights Statement

The Plus-Project Supplier Code of Conduct will be reviewed every two years at a minimum.

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## Introduction

Plus-Project is a Contract Research Organisation (CRO) supplying biometrics services from its head office at Booth's Park, Knutsford, England. Founded by Michael Wall, Alison Wall, and Philip Rowe in April 2014 the Plus-Project ethos is to recruit the most talented individuals and invest heavily in core skills.

On 18 December 2019, Plus-Project adopted an employee ownership model and sold a majority shareholding to an Employee Ownership Trust (EOT), becoming the first in our market. Delivering high returns to employees, this unique offering is attractive to new recruits, helps keep staff attrition low and helps maintain stable teams for our clients. Our reputation for excellence and our commitment to our team through Employee Ownership, is becoming increasingly known across the industry.

Here at Plus-Project we aim to develop long term partnerships with suppliers who will uphold our ethics and ethos and that are mutually beneficial. The purpose of this Supplier Code of Conduct is to inform Plus-Project's suppliers of our key expectations about the way we work. This Supplier Code of Conduct is based on our own Code of Conduct, and we have no additional expectations of suppliers that we do not already expect of ourselves.

## Our Core Values

Plus-Project is the first employee-owned CRO in the pharmaceutical industry. By providing a significant and meaningful stake in Plus-Project for all employees, Plus-Project attracts and retains the best talent, creating stable teams and happy employees, while delivering excellent quality services to our clients.

### We are committed to:

- Excellence in all that we do
- Taking a client centric approach
- Sustainability across our business
- Employee well-being and inclusivity
- Valuing our supply chain partners
- An ownership mentality and pursuing continuous improvement
- Operating fairly, transparently, honestly, and ethically

We seek suppliers who actively share our commitment to these values.

## Anti-Corruption and Preventing Bribery

Plus-Project suppliers are expected to be committed to ethical and honest business practices. We operate fairly in our dealings with clients, suppliers, and employees, ensuring transparency. Plus-Project suppliers will ensure that their employees are trained in preventing bribery and corruption practices.

**Insider trading** - Due to the nature of our core business, biostatistics support for clinical trials, Plus-Project suppliers access client "material non-public information" daily. Plus-Project suppliers and their employees must not trade in stocks whilst possessing "material non-public information" or encourage such trading by others. They will participate honestly, openly and promptly to any financial regulatory authority investigations.

**Conflict of interest** – we expect transparency in our dealings, including any conflict of interest where a supplier is involved in multiple interests, financial or otherwise.

**Gifts and entertainment** – Suppliers will have an anti-corruption policy or guidance which prohibits actions that can amount to bribery and corruption. This includes soliciting, accepting, or receiving any

benefit as an incentive, favour, or inducement for inappropriately performing a function or activity. Plus-Project suppliers will also prohibit offering, promising, or giving any benefit (such as money, gifts, or hospitality) or an advantage to another entity as an incentive, favour, or inducement for improper performance of a function or activity.

**Money laundering** – Supporting or facilitating any form of money laundering is strictly prohibited. Plus-Project suppliers and their employees must take reasonable care to not (deliberately or otherwise) tip off persons suspected of money laundering.

**Whistleblowing** - Plus-Project operates with the highest standards of honesty and integrity, and we encourage all suppliers to report any suspected wrongdoing. Plus-Project suppliers will not allow any form of retaliation for participation in a good faith report or investigation and has procedures in place for the handling and investigation of any such reports.

## Confidentiality

Confidentiality of information and data are fundamental to our business. Suppliers are expected to treat all communications as confidential.

Plus-Project suppliers will control and process data in compliance with GDPR (General Data Protection Regulation) and any other relevant data protection laws. Suppliers will be expected to enter into a Data Protection Agreement.

## Financial Integrity

Plus-Project suppliers will ensure that supplier financial accounts will be based on a fair representation of facts, and are accurate, complete, honest and timely. They will adhere to all applicable tax laws and regulations of each country and region where they conduct business.

We formalise all financial agreements with suppliers in a contract or written agreement which includes a description of the services being provided and the associated fees. We will be honest and responsible in our financial dealing with suppliers.

Clinical preferred suppliers will provide Plus-Project with evidence of any Anti-Bribery and Corruption Training if available.

## Health, Safety, and Well-being

Plus-Project suppliers will ensure the safety of their employees, with policies and procedures in place covering physical and mental well-being. Suppliers will have the relevant insurances in place to cover their business, employees, and clients, based on their local country legislations.

## Human Rights

Plus-Project suppliers will adhere to international standards and commit to protecting human rights, adopting a zero-tolerance policy to slavery, child labour, and human trafficking. Further details can be found in Plus-Project's Human Rights Statement publicly available on our website.

## Respect and Inclusivity

Plus-Project suppliers will strive to promote an inclusive culture. They will not discriminate based on age, disability, sex, or sexual orientation, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or beliefs.

Suppliers must ensure that all their employees are always treated with respect and dignity. Further details can be found in Plus-Project's Inclusion & Diversity Policy.

## Sustainability and Environment

Plus-Project is committed to engaging with suppliers whose values are aligned to our own, working towards common goals. We welcome the opportunity to work with a diverse supply chain. We have developed a sustainability training module that we ask our suppliers to complete.

Plus-Project is a member of EcoVadis, the world's most trusted business environmental, sustainability and governance rating. We recommend that suppliers do similar. Plus-Project will be happy to share our sustainability journey and any learnings and potential pitfalls.

Plus-Project publicly reports its environmental actions to CDP (Carbon Disclosure Project) and is committed to the Science Based Targets initiative. Again, we recommend our suppliers do similar. As a service-based Small and Medium-sized Enterprise in the life-sciences sector, we recognise that type 3 emissions are a priority. Most of our type 3 emissions are IT waste, business travel, and emissions in our supply chain. We will ask suppliers to provide data for inclusion in the calculation of our type 3 emissions.

We encourage suppliers to investigate schemes to ensure that reduce-reuse-recycle IT equipment.

Suppliers will provide Plus-Project with any policies on inclusion and diversity should they exist.

Plus-Projects suppliers will have the support of our dedicated Sustainability Manager and will be expected, at a minimum annually, to appraise our Sustainability Manager of progress towards sustainability and environmental goals supplying evidence wherever possible.

## IT Security

Suppliers are expected to ensure their IT security is sufficient and fit for purpose. Suppliers will provide Plus-Project with up-to-date IT certificates where applicable.

## Termination

Plus-Project may terminate a Master Service Agreement with any supplier should the standards and commitments detailed above not be met.