

## Our Trade Compliance Commitment

Inizio is committed to conducting our business in an honest, transparent, and ethical manner. We are providers of value-additive services to the pharma and biopharma industries in 50 jurisdictions. As such, we are mindful of our global trade compliance obligations.

Inizio will comply with all relevant economic sanctions, export control and customs laws that regulate the cross-border transfer of goods and technology.

## Limited Trade Compliance Risk

At our heart, Inizio is a service provider. The cross-border transfer of goods and technology is exceptional or limited to ancillary services and support we provide to our businesses and at times clients.

However, Inizio is mindful of the global trade environment and monitors **economic sanctions** (including embargoes and boycotts) which could restrict our ability to interact with certain clients and suppliers.

As select Inizio businesses serve their clients, the cross-border transfer of goods and technology is at times required. Here, Inizio

utilizes expert suppliers and our Legal and Compliance functions to assist with **export control** and **customs** requirements.

## Our Policy & Its Scope

### Scope of this policy

Inizio's International Trade Compliance Policy applies and pertains to:

- All Inizio locations, divisions, businesses, and affiliates, and
- All employees, contingent workers, contractors, and anyone who is engaged in activities acting on behalf of Inizio.

### Legal requirements and local-level obligations

Inizio monitors and adheres to various trade compliance obligations. Such obligations include but are not limited to the US Departments of Treasury and State-administered economic sanctions programs, the US Department of Commerce's Export Administration Regulations, and their EU, UK, and major trading nation equivalents.

Additional local, legal obligations may also be relevant to Inizio businesses. If conflicting, legal obligations always take precedence over this policy and its associated processes.

## Our Group Functions

Inizio will:

- Identify where trade compliance risks are most likely to materialize as part of our regular risk and control assessments,
- Maintain policies and procedures on how Inizio identifies and controls trade compliance risk,
- Implement and maintain effective watchlist screening controls,
- Incorporate trade compliance content into our mandatory compliance learning curriculum, and;
- Advise Inizio's businesses on contractual terms pertaining to economic sanctions (including embargoes and boycotts), export controls and customs arrangements.

## Our Businesses and Leaders

Business leaders, and managers across Inizio will:

- Promote Inizio's Code of Ethics and Supplier Code of Conduct, advocating for relationships and conduct consistent with these Codes and our policies,
- Closely consider new relationships and commercial opportunities with lesser-known clients and suppliers in new or non-core jurisdictions,
- Maintain business and divisional mechanisms that identify and vet commercial opportunities in new jurisdictions or with new clients or suppliers,
- Where Group, division or business-level risk-based criteria are met, escalate proposed relationships and opportunities for additional consideration (including watchlist screening) and;
- Ensure all compliance training requirements are fulfilled, encouraging those who work with us to understand and adhere to this policy and the Group and business processes that support it.

## Our People and Personnel

Those working with Inizio should be aware of our trade compliance obligations, and:

- Adhere to this policy and other related policies and procedures, including procedures for watchlist screening and the import and export of goods, software, and technology,
- Complete all trade compliance training, and other mandatory compliance learning in a timely manner,
- Watch for and raise potential instances of heightened trade compliance risk, including but not limited to:
  - New client and supplier relationships in non-core jurisdictions,
  - The cross-border transfer of a technology solution built specifically for a certain client,
  - Contract terms which mandate boycott participation or restrictive trade practices, and;
- Immediately report any suspected or known trade compliance violation to a trusted manager, Legal, Compliance or via the other channels detailed in Inizio's Speak Up Policy.

This policy, together with our Codes and Commitments and the processes and procedures referenced herein, comprise Inizio's Trade Compliance framework. Please contact [compliance@inizio.health](mailto:compliance@inizio.health) with any questions pertaining to this policy or our framework.