

Beghou Supplier Code of Conduct

1. Purpose

This Supplier Code of Conduct (“Code”) establishes the minimum standards that all suppliers, subcontractors, consultants, and partners (collectively, “Suppliers”) must meet when conducting business with or on behalf of Beghou.

Suppliers are expected to comply with this Code, all applicable laws and regulations, and the contractual obligations defined in their agreements with Beghou. In addition, all Suppliers are expected to act in a professional, responsible manner and with high integrity while working on behalf of Beghou.

Suppliers will provide each employee working on Beghou’s behalf a copy of this policy.

2. Scope

This Code applies to all Suppliers providing goods or services to Beghou Consulting globally, including those who process, access, or store Beghou or client data.

3. Business Integrity & Ethics

Suppliers must:

- Conduct business ethically, transparently, and in good faith
 - Comply with all applicable anti-corruption and anti-bribery laws (e.g., FCPA, UK Bribery Act)
 - Avoid conflicts of interest and disclose any potential conflicts
 - Maintain accurate books, records, and financial reporting for all transactions related to business with Beghou
 - Prohibit fraud, misrepresentation, or deceptive practices
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4. Data Privacy, Security & Integrity

Suppliers play a critical role in safeguarding sensitive information, particularly in the life sciences industry. Suppliers must comply with all applicable data privacy and data protection laws and regulations. Suppliers must also maintain sufficient safeguards to protect against the

destruction, loss or disclosure of Beghou's confidential information or the confidential information of our clients (as defined in your agreement with Beghou) in the Supplier's possession or control.

4.1 Data Protection Principles

Suppliers must:

- Protect the confidentiality, integrity, and availability of all Beghou and client data
- Process data only for authorized business purposes and in accordance with contractual terms
- Implement appropriate administrative, technical, and physical safeguards
- Adhere to industry standards such as ISO 27001, SOC 2, or equivalent where applicable

4.2 Protected Information (PI)

For the purposes of this Code, Protected Information (PI) includes, but is not limited to:

- Personally Identifiable Information (PII)
- Protected Health Information (PHI)
- Client confidential data, including commercial, clinical, and patient-level data
- Proprietary methodologies, software, and analytics

Suppliers must:

- Limit access to PI on a strict need-to-know basis
- Use encryption for PI in transit and at rest
- Prevent unauthorized access, disclosure, alteration, or destruction of PI
- Immediately report any suspected or actual data breach involving PI

4.3 HIPAA Compliance

Where applicable, Suppliers must:

- Comply with the Health Insurance Portability and Accountability Act (HIPAA) and related regulations
- Execute Business Associate Agreements (BAAs) when handling PHI on behalf of Beghou or its clients
- Implement safeguards required under the HIPAA Security Rule
- Ensure workforce training on HIPAA requirements
- Support breach notification obligations in accordance with HIPAA timelines

4.4 Data Integrity

Suppliers must ensure that:

- Data is accurate, complete, and reliable throughout its lifecycle
- Appropriate controls are in place to prevent unauthorized modification or corruption of data
- Audit trails are maintained for critical data processing activities

5. Information Security Requirements

Suppliers must maintain a robust information security program, including:

- Access controls and identity management
- Regular vulnerability assessments and penetration testing
- Incident response and disaster recovery plans
- Secure software development practices (where applicable)
- Ongoing monitoring and logging of systems handling sensitive data

Suppliers may be subject to security assessments or audits by Beghou Consulting or its clients. As part of its commitment to transparency, Suppliers are required to cooperate fully in any such audit.

6. Regulatory Compliance

Suppliers must comply with all applicable laws and regulations, including but not limited to:

- Data protection laws (e.g., GDPR, CCPA)
- Export, import, customs, sanctions, embargoes, boycott and other trade compliance laws and regulations

7. Labor & Human Rights

Suppliers must:

- Freely Chosen Employment: Prohibit forced labor, bonded, or indentured labor. Workers must work voluntarily, and management cannot confiscate identity documents.
- Child Labor: Adhere to the minimum legal age or at least 15, whichever is higher under applicable law.

- Wages and Benefits: Provide wages and benefits that, at a minimum, meet all legal requirements.
- Working Hours: Compliance with all applicable laws pertaining to the number of hours and days worked and rest periods.
- Non-Discrimination and Harassment: Provide a workplace free of discrimination, harassment, and coercion is mandatory.
- Freedom of Association: Respect for the right to organize, join unions, and bargain collectively without retaliation.
- Grievance Procedures: Establish an effective confidential grievance process to ensure that any worker, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind. The grievance process shall be transparent and include an appeals process for workers who disagree with how a grievance is resolved. Grievance mechanisms shall include the ability to report grievances anonymously, where allowed under applicable law.
- Supplier's Subcontractors: Supplier is responsible for ensuring compliance with this Code by all of its subcontractors that provide services to Beghou. Beghou expects Suppliers to apply similar standards to their subcontractors by communicating the expectations contained in this Code and holding them accountable as well.

8. Environmental Responsibility

Beghou encourages suppliers to adopt responsible environmental practices and to work toward continuous improvement in these areas. This includes minimizing environmental impact through reasonable resource use, and promoting sustainability practices where feasible.

9. Subcontracting & Third-Party Management

Suppliers must:

- Obtain prior approval before engaging subcontractors that will support Beghou work
- Ensure subcontractors comply with this Code and all contractual obligations
- Remain fully responsible for the performance and compliance of subcontractors

10. Monitoring, Audits & Enforcement

Beghou may, at its discretion:

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- Assess Supplier compliance with this Code
 - Conduct audits or request documentation as needed
 - Require time bound remediation plans for identified gaps

Failure to comply with this Code may result in corrective action, up to and including termination of the business relationship.

11. Reporting Concerns

Suppliers must promptly report any violations of this Code, legal requirements, or data/security incidents to Beghou as soon as they become aware of the violation(s). Suppliers are expected to cooperate fully with any investigation related to these policies. Where concerns involve Beghou employees or clients, Suppliers must cooperate in joint investigations.

Supplier employees can anonymously report any violations or concerns to Beghou's whistleblower email address: integrity@beghou.com.