

# SUPPLIER CODE OF CONDUCT

## Introduction

At Amylyx, we are on an audacious mission to develop novel therapies. We feel an unwavering responsibility to the communities with high unmet needs who are at the heart of our decisions. To support us in our mission, we work with business partners around the world.

Our Supplier Code of Conduct (the “Supplier Code”) was created to set forth Amylyx’ expectations for its research partners, suppliers, manufacturers, distributors, vendors, consultants, service providers, and other business partners (hereafter these parties are referred to as “Suppliers”). We expect our Suppliers to always conduct business with integrity and ethics and consistent with all applicable policies, laws, rules, and regulations. The Supplier Code provides specific guidance on the principles we expect to govern our Suppliers’ business and behavior. When working with Amylyx, each Supplier’s behavior must protect and promote both the letter of the Supplier Code and its spirit of ethical conduct. A Supplier’s ability and willingness to adhere to the minimum standards set forth in the Supplier Code are considered as part of the Supplier selection process and is an important factor in maintaining the business relationship.

## Business Ethics

Suppliers must conduct business in compliance with all laws, rules, policies, and regulations applicable to the Supplier wherever they do business.

### Compliance Program

Suppliers are expected to have an established compliance program, whereby its employees are required and encouraged, without fear of reprisal, to come forward to report any potential or actual violation of any law, rule, policy, or regulation by the Supplier, whether by its officers, employees, directors, or any third-party doing business on behalf of the Supplier. The Supplier should maintain and make known various channels through which employees can report concerns, including anonymously, if they choose. Suppliers must investigate and address reported concerns, where necessary.

### Bribes, Kickbacks, and Other Improper Payments

The Supplier shall comply with all applicable anti-bribery, anti-kickback, and anti-corruption laws in the areas in which it operates. The Supplier may not permit or condone bribes, kickbacks or other improper payments, transfers or receipts. No director, officer, employee or designated agent should offer, give, solicit or receive any money or other item of value for the purpose of improperly obtaining, retaining or directing business or bestowing or receiving any kind of favored treatment, whether directly or through third parties. Supplier employees who become aware of improper behavior in connection with work for Amylyx may also report their concerns at

Amylyx.ethicspoint.com or via U.S. toll-free helpline at (833) 778-1542; international phone numbers can also be found at Amylyx.ethicspoint.com.

### **Fair Competition and Antitrust**

Suppliers shall conduct their business in a manner consistent with fair and vigorous competition and adhere to all applicable anti-trust laws. Suppliers shall not abuse a dominant market position or take part in any anticompetitive practices such as fixing prices, rigging bids, or exchanging any pricing information with competitors. Suppliers must employ fair business practices, including accurate and truthful advertising.

### **Interactions with Health Care Professionals (HCPs) and Other Stakeholders**

When Suppliers are requested to engage with healthcare stakeholders, such as HCPs, healthcare organizations (HCOs), and advocacy organizations and their communities, they shall conduct such interactions in an ethical manner, in compliance with applicable laws and regulations, and consistent with industry codes.

### **Product Quality**

Suppliers involved in the supply, manufacturing, packaging, re-packaging, testing, storage, and distribution of materials/products for Amylyx will ensure compliance with applicable laws and quality regulations, as well as Good Manufacturing Practice (GMP), Good Distribution Practice (GDP), and Good Laboratory Practice (GLP) requirements for the markets in which the products are manufactured, registered, and distributed.

### **Confidential Information and Data Privacy**

Suppliers must protect and maintain the confidentiality of confidential information, including personal information, entrusted to them by Amylyx or other companies on behalf of Amylyx, except when disclosure is authorized by Amylyx or is legally mandated. Unauthorized disclosure of any confidential information is prohibited. Additionally, Suppliers should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to Amylyx or another company, is not communicated within Supplier except to employees and designated agents who have a need to know such information to perform their responsibilities. Suppliers must implement information security best practices to protect the confidentiality, integrity, and accessibility of data and assets. Suppliers are required to protect personal information in compliance with all applicable data privacy laws and regulations. This includes ensuring that personal information is only collected, used, accessed, stored, and disclosed as permitted by the agreement with Amylyx.

### **International Trade Compliance**

Suppliers must comply with any applicable governing import and export controls, sanctions, and other applicable trade compliance laws, regulations, and rules of the United States and of country(ies) where the transaction(s) occur(s). Suppliers must not participate in, cooperate with, or further the cause of any unsanctioned foreign economic boycott. Suppliers shall provide accurate and truthful information to customs and other authorities when required.

### **Counterfeiting**

Suppliers shall ensure the integrity of their supply chain and must not be involved in any activity that supports the illegal trade of medicines, which includes counterfeit, illegally diverted, fraudulently traded, tampered with and/or stolen product. Suppliers must provide a secure environment for all Amylyx-related activities and establish adequate mechanisms to ensure the authenticity of Amylyx products. Suppliers shall follow all applicable guidelines such as the U.S. Drug Quality and Security Act, and the EU Falsified Medicine Directive.

### **Animal Welfare**

Suppliers that use animals shall apply the highest ethical and welfare standards related to housing, husbandry, and veterinary care. Animal testing shall be conducted using accepted and state-of-the-art methods, minimizing pain, and only after considering all feasible options to replace, refine, and/or reduce (3R) testing. Whenever possible, alternatives to animal-using methods shall be prioritized. For all types of animal usage, Suppliers shall implement and comply with proper 3R, environmental enrichment, and hygiene and health monitoring programs. Suppliers must adhere to regulated processes and procedures for incident and risk management.

### **Clinical Trials and Patient Safety**

Suppliers conducting clinical trials for Amylyx must conduct such clinical trials in accordance with global standards of Good Clinical Practices, applicable local regulatory requirements and ethical principles. Suppliers must ensure all participants in scientific and medical research provide appropriately documented informed consent. Suppliers must report adverse events and special situations to Amylyx according to the relevant agreement(s) and applicable laws.

### **Intellectual Property**

Suppliers must respect Amylyx's as well as others' valid intellectual property rights and protect against its loss, theft or other misuse. Suppliers must seek prior written permission from Amylyx Legal or Corporate Communications before using Amylyx's name or logo in external materials or presentations.

### **Accuracy of Records**

All Supplier books, records, and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. Suppliers' financial statements must conform to generally accepted accounting rules, and no false or misleading entries shall be made in Suppliers' books or records for any reason.

### **Conflicts of Interest**

Suppliers are expected to manage conflicts of interest and should avoid situations that present a potential or actual conflict between their interests and those of Amylyx. Suppliers shall avoid interactions with any Amylyx employee that might conflict, or appear to conflict, with the employee's ability to act in the best interests of Amylyx. Suppliers with associates or members of their immediate family working for Amylyx shall disclose these potential conflicts of interest before engaging in any business relationship.

### **Gifts, Meals, and Entertainment**

Suppliers shall not provide any gifts, gratuities, hospitality, meals, or entertainment to Amylyx employees, government/regulatory officials or any other third party in any situation in which it might influence, or appear to influence, the employee's or regulatory official's decision concerning the Suppliers.

### **Monitoring and Auditing**

Suppliers must cooperate with investigations, audits, and/or monitoring as required by Amylyx. Amylyx may audit and/or monitor (or engage a third party to audit and/or monitor on their behalf) a Supplier to ensure the Supplier's compliance with applicable laws and regulations, the agreement between the parties, and this Supplier Code.

## **Human Rights and Labor**

Suppliers must uphold the human rights of workers and treat them with respect and dignity. Suppliers must support the protection of human rights and ensure that they are not complicit in any abuse of human rights.

### **Freely Chosen Employment**

Suppliers are prohibited from using forced, bonded, enslaved, indentured, or involuntary labor, or engaging in trafficking of persons. Suppliers must educate workers on prohibited trafficking activities and discipline workers found to have violated the applicable laws or rules. Suppliers must report any violations to Amylyx.

### **Child Labor**

Child labor is strictly prohibited. Employment practices must comply with the International Labor Organization (ILO) conventions and national law (whichever is stricter) relating to minimum age, child labor, and employment of underage workers.

### **Non-Discrimination and Fair Treatment**

Suppliers shall provide a workplace where employees are treated fairly and that is free of harassment and discrimination, human rights abuses, corporal punishment, excessive force, mental or physical coercion, verbal abuse, or threats of such actions. There shall be no discrimination for reasons based on, but not limited to, race, color, ethnicity, ancestry, national origin, citizenship, language, religion, sex, sexual orientation, age, gender identity or gender expression, marital or familial status, pregnancy, childbirth or related medical conditions, genetic information, union membership, political affiliation, military service or veteran status, medical condition, presence of a mental or physical disability, or any other characteristic protected under applicable law. Suppliers shall ensure that employees are not discriminated against in practices including applications for jobs, promotions, rewards, access to training and senior positions, job assignments, or conditions of employment (including wages, benefits, discipline, or termination) based on non-work-related personal characteristics.

### **Wages, Benefits, and Working Hours**

Suppliers shall comply with all applicable laws and regulations concerning wages, benefits, and working hours -- including those relating to minimum wages, overtime hours, piece work pay, and other elements of compensation -- and provide legally mandated benefits. Suppliers shall pay fair minimum wages and benefits according to the practices and applicable laws at the place of employment. Equal compensation for work of equal value shall be provided. The right to work and local national law on working time (or the ILO standards, if no national law exists) shall be respected. Overtime hours of workers shall be voluntary and shall not be requested on a regular basis. Suppliers shall have processes in place to record working hours.

### **Freedom of Association**

Suppliers should respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation, and join workers' councils. Workers should be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation, or harassment. Suppliers shall encourage open communication and direct engagement with workers to resolve workplace and compensation issues. Suppliers shall also respect the legal rights of employees to form and join worker organizations of their own choosing, including labor organizations or trade unions, and shall not discriminate based on an employee's decision to join or not join a labor organization.

## **Environment, Health & Safety**

Suppliers shall operate in a responsible and efficient manner to minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, engage in reuse and recycling programs, and avoid the use of hazardous materials where possible.

Suppliers shall provide a safe and healthy working environment for their employees and contractors. Health and safety measures shall be in place for workers, visitors, and others who may be affected by their business activities.

### **Environmental Authorizations and Reporting**

Suppliers shall comply with all applicable environmental laws, regulations, guidelines, and industry codes, including maintaining and complying with required environmental permits, licenses, material/article registrations, and restrictions.

### **Waste and Emissions**

Suppliers shall 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 should be appropriately managed, controlled, and treated prior to release into the environment, in accordance with local laws and regulations.

### **Spills and Releases**

Suppliers shall prevent and mitigate accidental spills and releases of chemical and polluting substances to the environment.

### **Resource Use**

Suppliers shall take measures to improve efficiency and reduce the consumption of natural resources. Suppliers are expected to implement energy and water use minimization programs that measure and monitor progress against goals for reduction in line with current climate science.

### **Sustainable Sourcing and Traceability**

Suppliers must carry out due diligence across their own supply chains to determine the source and chain of custody of critical raw materials to promote legal and sustainable sourcing.

### **Worker Protection**

Suppliers shall comply with the occupational health and safety obligations applicable under the law of the place of employment. Suppliers shall ensure safe workplaces, access to drinking water, and access to washroom facilities for all employees. Employees shall be provided with appropriate personal protective equipment. Employees shall be adequately protected from unnecessary exposure to chemical, biological, and physical hazards as well as physically demanding tasks. Suppliers shall provide adequate training programs, technical protective measures, and implement safety standards for the provision and maintenance of the workplace, workstations, and work equipment.

### **Process Safety**

Suppliers shall have oversight processes in place to identify risks from chemical and biological processes and to prevent or mitigate catastrophic releases of chemicals or biological agents.

### **Hazard Information**

Safety information relating to hazardous materials - including pharmaceutical compounds and intermediates - shall be available to educate, train, and protect employees and subcontractors. Suppliers shall provide written safety information in the language(s) used by employees for all hazardous materials including chemical and pharmaceutical substances, such as Safety Data Sheets (SDS). Suppliers shall have programs in place to prevent or mitigate unintended releases of chemicals associated with operations and processes. Suppliers shall regularly conduct specific risk assessments for hazardous installations and implement measures that prevent incidents such as chemical releases, fires, or explosions.

## **Management Systems**

Suppliers shall use management systems and processes that help ensure compliance with the standards in this Supplier Code.

### **Commitment, Accountability, and Risk Management**

Suppliers shall ensure commitment to the principles set forth in this Supplier Code by allocating appropriate resources. Suppliers shall identify, assess, and manage risks in all areas addressed in this document.

### **Legal and Customer Requirements**

Suppliers shall comply with all applicable international, national, and local laws and regulations, contractual agreements, and internationally recognized standards. All applicable permits, certificates, licenses, and registrations must be obtained and kept up to date.

### **Fraud Prevention and Reporting**

Suppliers shall have robust policies, procedures, and controls in place to prevent fraud, theft, embezzlement, and financial misstatement and report any potential occurrences of fraud relating to its work for Amylyx, regardless of materiality.

### **Documentation**

Suppliers should maintain documentation necessary to demonstrate compliance with applicable laws, regulations, guidelines, industry codes, and this Supplier Code. Upon request, Suppliers shall provide Amylyx access to such documentation.

### **Communication**

Suppliers should have effective systems to communicate the standards of this Supplier Code to employees, contractors, and applicable third parties.

### **Training and Competency**

Suppliers shall provide training programs for their employees and contractors to achieve appropriate levels of knowledge, skill, and ability to manage and address the expectations of this Supplier Code while performing their duties in support of Amylyx contracts. Such training programs shall be repeated and updated periodically.

### **Continual Improvement**

Suppliers are expected to continually improve the implementation of the principles and standards of this Supplier Code by setting performance objectives, executing implementation plans, and taking necessary corrective actions for deficiencies identified by internal or external assessments, audits, inspections, and/or management reviews.

### **Business Continuity**

Suppliers shall guarantee application of asset and security risk management activities across their organization and shall develop and implement appropriate business continuity plans and disaster recovery management for operations supporting Amylyx business. These plans should be formally documented and kept current to promptly recover and restore partially or completely interrupted operations to minimize disruption to Amylyx's business and protect Amylyx's reputation.

Suppliers are expected to immediately report incidents to Amylyx such as financial, economic, and supply changes, as well as significant risks, security incidents, or other material conditions that affect or may affect their ability to support Amylyx's business.

**Suppliers**

Suppliers shall ensure that all principles set forth in this Supplier Code are also endorsed and observed by their own suppliers and business partners (e.g. distributors, agents, etc.). Suppliers are expected to carry out due diligence across their supply chains and report any suspected or identified violations of the Supplier Code promptly to Amylyx.