

Legend Biotech Supplier Code of Conduct

A Message from Our CEO:

Delivering on our Mission to create a future where cancers and intractable diseases are curable requires more than scientific excellence – it demands unwavering commitment to ethical behavior, transparency, and respect.

At Legend Biotech Corporation, including its subsidiaries and affiliates (“Legend”, “we”, “our”), we act with integrity to ensure that all applicable laws, regulations, and industry standards are followed, and we expect the same from our suppliers, suppliers of suppliers, agents, vendors, subcontractors and other business partners that provide goods or services to, or on behalf of, Legend in both domestic and global markets (collectively, our “Suppliers”).

Suppliers are expected to undertake reasonable efforts to implement the principles of this Supplier Code of Conduct, or equivalent industry standards or codes, within their own supply chains. Suppliers must also communicate appropriate grievance mechanisms for confidential reporting of unlawful behavior and respond promptly to requests to complete any Legend-assigned training or provide information necessary to verify compliance with laws, regulations, or Legend policies. In addition, suppliers are required to implement corrective action plans for any identified deviations or non-conformances.

This Supplier Code of Conduct outlines the fundamental expectations regarding various ethics and compliance matters that Legend has established for its Suppliers.

Nothing in this Supplier Code of Conduct is intended to replace, supersede, or conflict with any applicable legal or regulatory requirement, or any contractual obligation that any Supplier may have with Legend. It is up to each Supplier to determine how to meet and demonstrate compliance with the principles and standards set forth in this Supplier Code of Conduct.

To reinforce the ethics and compliance standards to which we are committed, Legend based this Supplier Code of Conduct on the Pharmaceutical Supply Chain Initiative’s (PSCI) Pharmaceutical Industry Principles, Legend’s Code of Ethics and Business Conduct, and the 10 Principles of the United Nations Global Compact and UN Sustainable Development Goals.

Regards,



Ying Huang, Ph.D.

Chief Executive Officer

Compliance with applicable laws and regulations:

All Suppliers must comply with all applicable laws, rules, regulations, codes, treaties, conventions, or other legal requirements in the jurisdictions in which they conduct their business, including but not limited to the following:

- **Anti-bribery and anti-corruption laws.**

All forms of corruption, bribery, and kickbacks are strictly prohibited. Suppliers must not pay or accept bribes or facilitation payments of any kind or participate in other illegal inducement arrangements in business or government relationships, either directly or through intermediaries. Suppliers must ensure they have adequate systems in place to prevent bribery and comply with applicable anti-bribery and anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act.

- **Conflict minerals.**

Suppliers must support Legend in its commitment to reduce and, where feasible, eliminate from its supply chain the use of four minerals commonly referred to as 3TG (Tin, Tungsten, Tantalum, and Gold) that have been determined to have directly or indirectly financed or benefited armed conflict groups in certain areas, including the Democratic Republic of Congo and adjoining countries. Suppliers must take steps to track the source of the minerals used in their products and seek to avoid the use of these conflict minerals. Where elimination or avoidance aren't possible, suppliers should notify Legend Biotech of the presence and origin of these conflict minerals.

- **Fair competition.**

Suppliers must conduct their business in compliance with all applicable antitrust and fair competition laws.

- **Healthcare fraud and abuse laws.**

Suppliers must comply with all applicable U.S. and international healthcare fraud and abuse laws, including those U.S. laws that generally prohibit persons from soliciting, offering, receiving, or paying any compensation to induce someone to order or purchase items or services that are in any way paid for by Medicare, Medicaid, or other government-funded healthcare programs. These applicable laws also prohibit submitting or causing to be submitted any fraudulent claim for payment to a government. Suppliers must follow local and international applicable laws and ethical standards and strictly prohibit bribes, kickbacks, illegal payments, and any other offer of items of value that may inappropriately influence or reward the order, purchase, recommendation or use of our products and services, whether provided directly or through a third party, such as a distributor, customs broker, or other agent.

- **Import/Export and Debarment laws.**

Suppliers must comply with all applicable import and export controls, sanctions, other trade compliance, and debarment laws of countries with jurisdiction over relevant transactions involving Legend.

Ethics and Integrity:

Suppliers must conduct their business with the utmost integrity and firmly adhere to the following ethical principles:

- **Business records.**

Suppliers must maintain, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements. All financial books and records must conform to the generally accepted accounting principles of the jurisdiction in which the Supplier operates. Records must be legible, transparent and reflect actual transactions and payments in reasonable detail.

- **Conflicts of interest.**

We expect our Suppliers to avoid all conflicts of interest or situations creating the appearance of a potential conflict of interest in their dealings with Legend. We expect our Suppliers to provide notification to all affected parties in the event an actual or potential conflict of interest arises. Any potential conflict must be disclosed to Legend's contractual representative and cleared in advance of proceeding with any relevant business activity.

- **Gifts and entertainment.**

Suppliers should avoid giving gifts or anything else of value to Legend team members that might appear to influence, compromise judgment, or obligate those team members in any way to the Supplier. Suppliers may provide business-related meals, refreshments, and/or entertainment to Legend team members that are occasional, of modest value, in accordance with local country code or policy, and not intended to or could not be reasonably perceived as affecting business decisions. Questions on gifts and entertainment may be directed to Legend's Global Office of Compliance at Compliance@legendbiotech.com

- **Openness to assessments and audits.**

We expect Suppliers to be open and transparent to our audit and or assessment of their compliance with this Supplier Code of Conduct. Non-compliance with the Supplier Code of Conduct may result in termination of the business relationship.

Privacy and confidentiality:

Suppliers must safeguard personal and confidential information to ensure company, worker, patient, and research subjects' privacy and legal rights are protected. Suppliers must immediately report any loss, unauthorized use, or improper disclosure of either personal information or Legend's confidential information to Legend's Privacy Office at Privacy@legendbiotech.com

- **Privacy**

Suppliers must comply with all applicable data privacy and data security laws, along with Legend agreements, when handling personal information. "Personal Information" means any information that identifies, or could be used to identify, an individual.

- **Confidential information**

Suppliers must maintain and implement a comprehensive information security program to protect confidential and personal information. Suppliers must not share Legend's confidential information with unauthorized third parties (including information relating to our products, customers, vendors, pricing, costs, strategies, processes, and practices). Suppliers requiring the exchange of confidential information with Legend are required to execute a confidentiality agreement with Legend in advance.

Labor, safety, and human rights:

Suppliers must uphold the human rights of workers, treat them with dignity and respect, and must not be complicit in human rights abuses. Suppliers must comply with all applicable laws and regulations related to human rights compliance, fair labor practices, and prohibiting slavery, forced labor, child labor, human trafficking, and sexual exploitation.

- **Freely chosen employment.**

Suppliers are not permitted to use any form of forced or compulsory labor, such as slavery, bonded labor, prison labor, practices similar to slavery, servitude, or other comparable workplace conditions. Supplier employees should be free to resign their employment in accordance with local and national laws or regulations without unlawful penalty.

- **Worker safety.**

Suppliers are required to follow occupational health and safety standards as set by both national legislation and international agreements. This includes measures to protect workers from excessive exposure to chemical, biological, or physical hazards, as well as from physically demanding tasks, whether in the workplace or in company-provided housing. Suppliers must also ensure proper working conditions and take steps to prevent harassment, abuse, or inhumane treatment, including sexual harassment or exploitative conduct.

- **Non-discrimination.**

Suppliers are required to ensure non-discrimination and uphold respect for employees, treating all individuals with dignity. Discrimination against qualified persons based on veteran status, disability, protected characteristics, race, ethnicity, nationality, age, religion, pregnancy, sexual orientation, gender identity, political affiliation, union membership, or marital status is not permitted.

- **Human rights accountability in the value chain.**

Suppliers must establish and maintain robust policies and management systems to identify, prevent, mitigate, and address actual or potential negative impacts on human and labor rights throughout their operations, supply chains, and business relationships. This responsibility extends beyond compliance and reflects a proactive commitment to ethical business conduct. In alignment with the [UN Guiding Principles on Business and Human Rights](#), suppliers are expected to demonstrate a formal commitment to respecting human rights, conduct ongoing human rights due diligence, engage meaningfully with affected stakeholders, and implement effective mechanisms for remediation when adverse impacts occur. Additionally, suppliers should be prepared to share

relevant and accurate information regarding human rights practices and performance when requested, using appropriate formats and methods as needed.

- **Fair compensation.**

Suppliers must pay workers in accordance with applicable wage laws, including minimum wages, overtime hours, and mandated benefits in any jurisdiction where they operate. Suppliers must clearly and promptly communicate to workers the terms and structure of their compensation. This includes informing workers in advance if overtime work is required and specifying the wages to be paid for such overtime. Additionally, suppliers must refrain from any unjust withholding of wages.

- **Hours of labor.**

Suppliers are required to adhere to all relevant laws and regulations pertaining to fair labor practices and wage and hour standards in every jurisdiction where they conduct business. This includes compliance with statutes governing working hours, overtime, and rest periods.

- **Substance abuse.**

Suppliers must maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

- **Child labor and young workers.**

Suppliers must not use child labor in their operations. The term “child” refers to any person under the applicable minimum age for completion of compulsory education, or under the minimum age for employment in any particular country, whichever is the highest. Where permitted, young workers below the age of 18 must only be employed in non-hazardous work environments.

- **Freedom of association.**

Suppliers must respect the freedom of association. Suppliers must respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek collective representation, and join workers’ councils. Workers must be able to communicate openly with management regarding working conditions without threat of harassment, intimidation, or reprisal.

- **Immigration law and compliance.**

Suppliers must comply with applicable immigration laws and regulations in every jurisdiction where they operate and only employ workers whom have a legal right to work in the relevant location.

Environmental stewardship and sustainability:

Suppliers must operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, avoid the use of hazardous materials where applicable, and engage in activities that reuse and recycle raw materials.

- **Environmental compliance.**

Suppliers must comply with all applicable environmental regulations. All required environmental permits, licenses, and registrations must be obtained and their operational and reporting requirements followed.

- **Waste and emissions.**

Suppliers must have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater, or air emissions with the potential to adversely impact human or environmental health must be appropriately managed, controlled, and treated prior to release into the environment. This includes managing releases of active pharmaceuticals into the environment.

- **Spills and releases.**

Suppliers must have processes and systems in place to prevent and mitigate accidental and diffusive spills and releases to the environment.

- **Resource use.**

Suppliers are required to implement measures that enhance efficiency and minimize resource consumption. Additionally, for all materials procured, suppliers should strive to source them sustainably.

Governance and compliance systems:

Suppliers must demonstrate commitment to the concepts described in this Supplier Code of Conduct by allocating appropriate resources to managing ethics and compliance risks.

- **Commitment and accountability.**

Suppliers must demonstrate commitment to the principles and standards outlined in this document by allocating appropriate resources and identifying senior responsible personnel, thereby creating a culture of responsible practices.

- **Risk Assessment and Risk Management.**

Suppliers must have mechanisms to assess and manage risks in all areas addressed in this Supplier Code of Conduct, including business continuity and risk management plans to facilitate continuity of operations.

- **Emergency preparedness and response.**

Suppliers must identify and assess emergency situations in the workplace and any company-provided living quarters, and minimize their impact by implementing emergency plans and response procedures. Suppliers must have procedures in place to identify the risks from chemical and biological processes and to prevent or respond to the catastrophic release of biological agents.

- **Documentation.**

Suppliers must maintain documentation necessary to demonstrate conformance with these expectations and in compliance with applicable regulations.

- **Training Competency.**

Suppliers must have a training program that educates their employees to make ethical decisions in compliance with applicable laws, regulations, and contract requirements and that enables those employees to address these expectations.

- **Continual Improvement.**

Suppliers are expected to continually improve their ethics and compliance management system by setting performance objectives, executing implementation plans, and taking necessary corrective actions for deficiencies identified by internal or external assessments, audits, inspections, and management reviews.

- **Raising Concerns:**

All Supplier employees should be encouraged to report concerns or illegal activities in the workplace without fear or threat of retaliation, reprisal, intimidation, or harassment. Suppliers must investigate such reports and take corrective action as needed.

Suppliers who believe that a Legend team member, or anyone acting on behalf of Legend, has engaged in illegal or otherwise improper conduct should report the matter, unless prohibited by applicable law, promptly to Legend at Compliance@legendbiotech.com