

# Supplier Code of Conduct

## Background

Anavex Life Sciences Corp. and its affiliates and subsidiaries (“Anavex” or the “Company”), often engage third parties to provide goods or services the Company or on its behalf in the conduct of its clinical trials, experiments, or other business operations. Anavex deals fairly with all contractors, vendors, and suppliers and expects all suppliers to agree to the terms of this Supplier Code of Conduct.

## Purpose and Scope

This purpose of this Supplier Code of Conduct is to communicate to Anavex’s vendors and business partners that corporate integrity, responsible business practices, and the safety and wellbeing of workers and of the environment are the top priority of Anavex and to ensure that Anavex’s minimum standards be met by any supplier while conducting business with or on behalf of Anavex.

These principles apply to all aspects of Anavex’s business including manufacturers, distributors, vendors, suppliers, contractors, and subcontractors that provide goods or services to the Company or on its behalf. Healthcare professionals, patient consultants, and clinical trial sites adhere to International Council for Harmonization (ICH) guidelines and therefore are outside of the scope of this Supplier Code of Conduct. Entities subject to the scope of this Supplier Code of Conduct are referred to herein as “Suppliers”.

At Anavex, we are committed to selecting suppliers who have a positive impact on our value chain by adhering to responsible and sustainable business practices. We endeavor to do business with reputable suppliers that share our commitment to fundamental principles, including honesty, integrity, fair treatment of workers, safe and healthy workplaces, respect for the environment and human rights, and compliance with applicable laws. Once Anavex enters into a contractual relationship with a supplier, we retain the right to request documents and information and to conduct audits as necessary to establish compliance with this Code. Anavex reserves the right to terminate its relationship with any supplier that violates this Code.

## General

- Suppliers must comply with all applicable laws, rules, and regulations.
- Suppliers must comply with all customer requirements.
- Suppliers must follow Good Manufacturing Practices (GMP), Good Clinical Practices (GCP), and Good Laboratory Practices (GLP), as applicable.
- Suppliers must be able to provide documentation as described more fully below.

- Suppliers must comply at all time with this Code or develop, implement, maintain and comply with written standards, policies, procedures, and controls comparable to this Code.
- Suppliers must periodically evaluate their operations to ensure compliance with this Code and all applicable laws, rules, directives, and regulations.
- Suppliers must maintain complete and accurate records, including records demonstrating compliance with this Code and all applicable laws, rules, directives, and regulations.

## **Environmental**

- Suppliers must comply with all environmental laws and regulations.
- Suppliers must comply with all chemical regulations.
- Suppliers must obtain all relevant environmental and government permits, registrations, and licenses to support its business operations.
- Suppliers must make a reasonable effort to minimize energy, water, and raw material usage.
- Suppliers must control and properly treat all wastewater and solid waste.
- Suppliers must make a reasonable effort to minimize air and water pollution.
- Suppliers must consider their suppliers' environmental credentials and performance.
- Suppliers must be able to audit subcontractors to ensure compliance with policies.

## **Ethics and Business Practices**

- Suppliers must not receive or offer bribes. A bribe includes any payment, gift, promise or offer of money or anything of value, whether directly or indirectly through third parties, to any person or entity for purposes of corruptly influencing any act, omission, or decision of the recipient in his or her official capacity for the purpose of obtaining or retaining business or securing an improper advantage.
- Suppliers must not give or receive gifts, lavish hospitality, or travel benefits to influence decisions.
- Suppliers must not engage in price fixing or other anticompetitive practices.
- Suppliers must have policies in place to avoid bribery, fraud, and conflict of interest.
- Suppliers must obey all trade laws, directives, and regulations, including without limitation applicable sanctions imposed by the U.S. and E.U. Suppliers shall not provide to Anavex any goods or services from a country, person, or entity that is subject to U.S., E.U., or other regional, unilateral, and multilateral regulations that restrict transactions with specific persons, entities, or countries. Accordingly, Suppliers shall implement compliance processes to screen its employees, suppliers, vendors, agents, and other business associates involved in any transaction to provide goods or services connected in any way with Anavex's business to ensure compliance with such laws, directives, or regulations concerning sanctions.

- Suppliers must issue correct invoices in accordance with approved quotes, work orders or contracts.
- Suppliers must require all subcontractors and suppliers to obey all business laws and regulations and ensure compliance with this Code in connection with the provision of any goods or services relating to any aspect of Suppliers' business with Anavex.

## **Health and Safety**

- Suppliers must comply with all applicable health and safety laws and standards, including those relating to emergency preparedness, industrial hygiene, sanitation, and housing.
- Suppliers must protect workers from unsafe working conditions by notifying them of potential dangers, training them in how to mitigate such dangers, providing them with appropriate safety gear, clean drinking water, and sanitary living and working spaces.
- Suppliers must have appropriate emergency procedures in place.
- Suppliers must communicate with Anavex, the appropriate local authorities, and workers if an emergency occurs.
- Suppliers must ensure the competency of all employees by providing appropriate training.
- Suppliers must have a means for workers to report unsafe conditions without fear of reprisal.
- Suppliers must seek to continually improve practices to insure the safest outcomes.

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

- Suppliers must comply with all applicable labor and employment laws regarding wages, working hours, and conditions. Wages and benefits must not be delayed or withheld from workers when they are due. Suppliers shall not make fraudulent misrepresentations to workers about the wages or benefits they will receive.
- Suppliers must not use forced, compulsory, bonded, indentured, involuntary, prison, trafficked, or slave labor, or engage in activities commonly indicating a likelihood of forced labor, including without limitation the following:
  - Imposing excessive recruitment fees requiring workers to incur debts or loans to secure work or engaging labor recruiters who do the same;
  - Withholding of passports or other forms of identification, work permits, immigration documents, or other valuables;
  - Illegal or excessive wage deductions for accommodations, transportation, or other employer provided services or punitive fines;
  - Lack of clear terms and conditions in employment agreements if such agreements are required by local law;
  - Forced overtime without pay or penalty;

- Suppliers must ensure that any subcontractors or suppliers engaged to provide goods or services relating to any aspect of the business with Anavex also engage in business practices that are transparent and free of forced labor of any kind.
- Suppliers must ensure that none of the products or services provided to Anavex (1) is subject to a Withhold Release Order by U.S. Customs and Border Protection or its equivalent in any country or (2) appears on the Bureau of International Labor Affairs List of Goods Produced by Child Labor or Forced Labor or its equivalent in any country, each as may be updated from time to time.
- Suppliers must comply at all times with the Uygher Forced Labor Prevention Act and upon request timely provide sufficient documentation of the origin and shipment (including transshipments) of products provided in connection with any aspect of the business with Anavex. Such documentation should be consistent with guidance from the US Customs & Border Protection Agency, and include, for example, certificates of origin, requests for quotations, commercial invoices, purchase orders, bills of lading, export packing lists, airway/vessel bills, dock/warehouse receipts, warehouse inventory control, production orders, manufacturing/process control, finished good warehousing, statements from the importers of record regarding the character of labor used in the production, manufacture, or sourcing of products, including raw materials and component parts relating to any aspect of the business with Anavex.
- Suppliers must not use child labor, as defined by local law and must ensure that any subcontractors or suppliers engaged to provide goods or services relating to any aspect of the business with Anavex also engage in business practices that are transparent and free of child labor of any kind.
- Suppliers must not allow anyone under 18 to work in a hazardous environment.
- Suppliers must implement and conduct risk screening and due diligence procedures in procurement, sourcing, and supply chain activities to ensure that their respective supply chains are free of forced labor, child labor, and human trafficking.
- Suppliers will use commercially reasonable efforts to ensure that any subcontractor or supplier contract relating to any aspect of the business with Anavex includes provisions expressly prohibiting forced labor, child labor, and human trafficking, obligations for each subcontractor or supplier in turn to implement policies and procedures consistent with this Code, including similar requirements regarding due diligence and documentation, risk identification, risk mitigation, and notice of any deficiencies in available data, human rights red flags or other risk factors, or other evidence of actual or potential violations of applicable laws relating to forced labor, child labor, and human trafficking. Suppliers will use commercially reasonable efforts to ensure that their respective first-tier supplier(s) agree in writing to ensure compliance with this Code and, in turn, include those requirements in their respective contracts with the next-tier suppliers, and so on, throughout the supply chain, to ensure the standard is consistent throughout the supply chain.
- Suppliers must ensure workers are not treated harshly or inhumanely.
- Suppliers must not allow workers to be sexually harassed, sexually abused, mentally or physically coerced, verbally abused, threatened, or subjected to corporal punishment.

- Suppliers must not allow discrimination in employment hiring or promotion based on race, color, sex, religion, age, political leaning, nationality, sexual orientation, gender reassignment, pregnancy, maternity, caste, or any other characteristic prohibited by local or national law.
- Suppliers must allow workers to freely associate or collectively bargain.

### **Animal Welfare**

- Suppliers must ensure all animals are treated humanely by minimizing pain and stress.
- Suppliers must reduce the use of animals in research whenever possible.

### **Data Privacy, Security and Confidentiality**

- Suppliers must safeguard confidential information of clients, workers, and patients.
- Suppliers must protect Anavex intellectual property.
- Suppliers must abide by applicable privacy laws.

### **Investigation, Remedial Action, and Reporting**

- Suppliers shall investigate any allegations, events, or reports of actual or suspected violations of this Code, remediate any such identified risk, including through the development of a formal written action plan for such remediation, up to and including termination of any implicated third-party relationships and identify and engage suitable alternatives.
- Suppliers shall notify Anavex in writing within three business days after becoming aware of any allegations, events, or reports of violations of this Code.

### **Audits**

- Upon written request from Anavex, Suppliers shall cooperate in independent third-party audits of its supply chain to verify Suppliers' implementation of compliance procedures consistent with this Code, including (i) results of risk screening and due diligence activities, (ii) age, hours, and wage documentation for employees, (iii) supply chain traceability documents sufficient to revoke a Withhold Release Order by the U.S. Customs & Border Protection Agency; (iv) audits or reports regarding the ethics, integrity, safety, or other reputational risks associated with Suppliers or their respective supply chains, (v) results of any investigation involving allegations, events, or reports of violations of this Code, (vi) any action plan for remediating any identified risk of violations arising in connection with this Code; and (vii) any further documentation reasonably necessary to fulfill or demonstrate compliance with obligations under this Code.

### **Conclusion**

This Supplier Code of Conduct contains general guidelines for conducting business consistent with Anavex's high standards. If you have any questions about this policy, please contact the Company.

Adopted: April 25, 2024