



Supplier Code

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TABLE OF CONTENTS

Supplier Code of Conduct	3
Preface.....	3
Scope	3
Management, Monitoring and Evaluation.....	3
Section 1: Ethical Practices.....	4
Conflict of Interest	4
Business Integrity & Fair Compensation	4
Supplier Inclusion.....	4
Clinical Trials	4
Animal Welfare	5
Product Quality	5
Financial & Business Records	5
Privacy	5
Intellectual Property	5
Section 2: Labor and Human Rights	6
Child Labor.....	6
Non-discrimination	6
Fair Treatment	6
Wages, Benefits & Working Hours	6
Forced Labor & Human Trafficking.....	6
Section 3: Health and Safety	7
Worker Protection & Safety	7
Process Safety.....	7
Emergency Preparedness.....	7
Hazard Information.....	7
Section 4: Environment.....	8
Environmental Authorizations.....	8
Waste & Emissions.....	8
Spills and Releases	8
Conflict Minerals.....	8
Restricted Substances	8
Sustainability.....	8
Section 5: Management System.....	9
Legal and Customer Requirements	9
Documentation	9
Audits and Assessments.....	9
Risk Management	9

Supplier Code of Conduct

Preface

For 30 years, Gilead has advanced the care of people suffering from life-threatening illnesses, delivering substantial value to patients, healthcare systems and shareholders around the world.

At Gilead, we are committed to maintaining the highest standards of legal and ethical conduct; we expect the same of our suppliers. This Supplier Code of Conduct (hereby “Supplier Code”) reflects the business practices and principles of behavior that support this commitment. It should be considered against the backdrop of Gilead’s corporate core values of Integrity, Teamwork, Accountability, Inclusion and Excellence. We expect every supplier to read, understand and agree to the Code and its application to the performance of their supplier responsibilities.

The integrity and reputation of Gilead depends on the honesty, fairness and integrity of not only our employees but the suppliers and third parties that help support our day-to-day activities. In addition to complying with applicable laws, each of us is required to apply common sense, together with our own highest personal ethical standards, in making business decisions where there is no stated guideline in the Supplier Code. Unyielding personal integrity is the foundation of corporate integrity.

Scope

The provisions of this Supplier Code convey Gilead’s expectations for all suppliers with whom it does business. Gilead expects that these principles apply to suppliers and their supporting subcontractors. The provisions conveyed in this Supplier Code provide the minimum standards expected of suppliers to Gilead. Non-adherence to these principles will be a factor in considering “eligibility as a Gilead supplier.”

Management, Monitoring and Evaluation

At minimum, Gilead expects that suppliers have met the standards conveyed in the Supplier Code. Gilead expects its suppliers will establish and maintain appropriate management systems related to the content of this Supplier Code, and that they actively review, monitor and modify their management process and business operations to ensure alignment with the principles set forth in the Supplier Code. To review the progress of suppliers in implementation of the Supplier Code, Gilead may take various supporting initiatives, including, requesting suppliers to self-certify compliance with the Supplier Code and, upon mutual agreement of date and time, to conduct on-site evaluations and inspections of supplier facilities and those of their subcontractors.

Ethical Practices

Gilead expects its Suppliers to conduct their business in an ethical manner and act with integrity. This is supported by the following areas:

Conflict of Interest

Suppliers must disclose to Gilead management any potential, perceived or actual conflicts of interest that could impact business dealings with Gilead. Gilead management must review all such situations and document any potential conflicts should business dealings proceed. A conflict of interest could arise under multiple scenarios, including but not limited to situations in which:

- A supplier employee or representative's personal interests or activities could influence, or could appear to influence, the supplier's ability to act in the best, objective interests of Gilead;
- A Gilead employee or professional contracted by Gilead may have an interest of any kind in the supplier's business or any current economic ties with the supplier or its employees or representatives; or
- A supplier's relationship with third party entities who may compete with Gilead or whose interests may conflict with Gilead could influence or could appear to influence the supplier's ability to act in the best, objective interests of Gilead.

Business Integrity & Fair Compensation

Corruption, extortion and embezzlement are prohibited. Suppliers shall not pay or accept (directly or indirectly) bribes or participate in other illegal inducements in business or government relationships, and shall comply with such anti-corruption and anti-bribery laws as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, as well as local laws prohibiting bribery and corrupt payment and may involve anything of value. Certain types of suppliers that have interactions with healthcare professionals or government officials (such as regional business partners and meeting planners) are subject to additional Business Conduct and other compliance-related requirements. Suppliers are responsible for consulting with their respective Gilead contacts for more information and ensuring they are in compliance with such requirements.

All suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws. Suppliers shall employ fair business practices, including, accurate and truthful advertising. Suppliers are not to use Gilead's name or marks (or that of our affiliates or products) in publicity or advertising without our prior written consent.

Supplier Inclusion

Suppliers are to identify and provide opportunities to small and diverse businesses in connection with supplying useful goods and services to Gilead at competitive prices. This aligns with Gilead's value of Inclusion.

Clinical Trials

When engaged in clinical trials on behalf of Gilead, all clinical trials shall be conducted in accordance with the global standards of Good Clinical Practices, applicable local regulatory requirements and following the ethical principles that have their origin in the Declaration of Helsinki (the Declaration of Helsinki was developed by the World Medical

Association (WMA) as a statement of ethical principles for medical research involving human subjects, including research on identifiable human material and data).

Animal Welfare

All animal research conducted by Gilead or research partners on behalf of our therapeutic candidates is done in accordance with industry and government standards to ensure appropriate care for the animals.

Product Quality

Suppliers involved in the supply, manufacturing, packaging, testing, storage and distribution of materials and/or products on Gilead's behalf will ensure compliance with applicable quality regulations and adhere to current GXP (e.g. Good Manufacturing Practices) requirements for the markets in which the products are manufactured, registered and distributed.

Financial & Business Records

Suppliers must maintain all financial books and records in conformance with generally accepted accounting principles. Business records must be accurate in all material respects. Business and financial records must be legible, transparent and reflect actual transactions and payments.

Privacy

Suppliers shall operate in a manner that is consistent with applicable data protection laws, including privacy and security protections that are appropriate to the sensitivity of the personal information collected or otherwise processed by the Supplier on behalf of Gilead. Suppliers shall have appropriate organizational structures and procedures to ensure the protection of personal information against accidental, unauthorized or unlawful loss, destruction, alteration, disclosure, use or access. This includes policies and procedures to address technical and organizational security as well as confirmation of compliance with these requirements. Suppliers must comply with laws that govern cross-border data transmissions.

Intellectual Property

Suppliers shall safeguard and respect Gilead's Intellectual Property and related rights.

Labor and Human Rights

Suppliers shall be committed to uphold the human rights of their workers and treat them with dignity and respect. Suppliers shall support the protection of internationally proclaimed human rights and ensure they are not complicit in any abuses of human rights. This is supported by the following areas:

Child Labor

Suppliers shall not use child labor. The employment of young workers below the age of 18 shall not occur in hazardous work or night shift work, and shall only be allowed when young workers are above a country's legal age for employment or the age established for completing compulsory education.

Non-discrimination

Suppliers must comply with all applicable employment laws and regulations and shall provide a workplace free of harassment and discrimination. Suppliers shall not discriminate against individuals on the basis of race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, marital status or other reasons prohibited by law.

Fair Treatment

Suppliers shall provide a workplace free of harsh and inhumane treatment, including, any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, and free of threats of any such treatment.

Wages, Benefits & Working Hours

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers shall communicate to the worker the basis on which they are being compensated in a timely manner, including times and rates for overtime, as dictated by local law and Supplier policy. Any wage deductions should be reasonable, clearly understood by the workers, and allowed by applicable law. Suppliers should follow all applicable laws as it relates to holidays and time off.

Forced Labor & Human Trafficking

Suppliers shall not use forced labor or human trafficking in any instance.

Health and Safety

Suppliers must furnish to each of its employees a workplace that is free from recognized hazards causing or likely to cause death or serious physical harm. This shall be in compliance with all applicable laws. This principle is supported by the following areas:

Worker Protection & Safety

Suppliers shall protect workers from overexposure to chemical, biological, physical hazards and physically demanding tasks and conditions (such as extreme heat or cold) in the workplace and in any company-provided living quarters. Suppliers shall ensure workers are subject to medical evaluation and also monitored for exposure to chemicals and noise. Additionally, suppliers shall provide PPE (personal protective equipment) to workers.

Process Safety

Suppliers shall perform an initial process hazard analysis (hazard evaluation). The hazard analysis shall be appropriate to the complexity of the process and shall identify, evaluate, and control the hazards involved in the process. Suppliers shall have programs in place to prevent or mitigate catastrophic releases of chemicals or other materials, including specific programs to prevent fires and explosions. Additionally, suppliers shall have preventive maintenance, periodic inspections and audits in place.

Emergency Preparedness

Suppliers shall identify and assess emergency situations in the workplace and any company-provided living quarters, and shall work to minimize their potential impact by implementing emergency plans, drills and response procedures.

Hazard Information

Safety information relating to hazardous materials - including pharmaceutical compounds and pharmaceutical intermediate materials - shall be available to educate, train, and protect workers from potential hazards. This education should be both initial and periodic for workers. Such safety information shall be available in written documents, such as Safety Data Sheets (SDS) and/or Standard Operating Procedures (SOP) in languages commonly used by the Supplier's workforce.

Suppliers shall ensure appropriate communication to other business partners in the value chain, as appropriate, including Gilead and its logistic and distributor partners, to ensure hazards are appropriately disclosed and managed.

Environment

Suppliers shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to engage in reuse and recycling programs, and where possible, to avoid use of hazardous materials. This principle is supported by the following areas:

Environmental Authorizations

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

Waste & Emissions

Suppliers shall 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 emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.

Spills and Releases

Suppliers shall have systems in place to prevent and mitigate accidental spills and releases to the environment.

Conflict Minerals

Suppliers shall ensure that all parts and products supplied to Gilead do not contain "Conflict Minerals," i.e., columbite-tantalite, cassiterite, wolframite (or their derivatives tantalum, tin and tungsten) or gold sourced from the Democratic Republic of the Congo (DRC) or an adjoining country that has directly or indirectly financed or benefitted armed groups in the DRC or an adjoining country. Suppliers shall have systems in place that are designed to meet these objectives.

Restricted Substances

Suppliers are to adhere to all applicable restricted substance laws, regulations and customer requirements, including, responding to requests for substance composition in materials/parts, prohibition or restriction of specific substances, including labeling for recycling and disposal.

Sustainability

Suppliers shall reduce their environmental footprint through minimizing their use of natural resources and the environmental impact of their activities.

Suppliers shall use management systems to facilitate continual improvement and compliance with the expectations of this Supplier Code. This principle is supported by the following areas:

Legal and Customer Requirements

Suppliers shall identify and comply with applicable laws, regulations, standards and relevant customer requirements, which include compliance with applicable laws and regulations prohibiting the use of forced, bonded, child, involuntary, slave or indentured labor or involuntary prison labor. Gilead reserves the right to audit its suppliers.

Documentation

Suppliers shall maintain documentation necessary to demonstrate conformance with these expectations, and compliance with applicable regulations.

Audits and Assessments

Suppliers shall perform periodic evaluations of its facilities and operations to ensure compliance with this Code and the law. Suppliers will permit Gilead and third parties designated by Gilead to periodically evaluate supplier's facilities and operations. Suppliers shall have a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.

Risk Management

Suppliers shall identify, assess and manage risks in all areas.