

BISPECTRA

Sustainability Policy  
Handbook

## Table of Contents

<b>ANTI-DISCRIMINATION POLICY .....</b>	<b>3</b>
<b>BIODIVERSITY POLICY .....</b>	<b>5</b>
<b>CHEMICALS AND WASTE POLICY.....</b>	<b>7</b>
<b>CHILD LABOR, FORCED LABOR, AND HUMAN TRAFFICKING POLICY .....</b>	<b>10</b>
<b>CONFLICT MINERALS POLICY .....</b>	<b>13</b>
<b>CONFLICT OF INTEREST POLICY .....</b>	<b>15</b>
<b>CUSTOMER HEALTH AND SAFETY POLICY .....</b>	<b>17</b>
<b>EMPLOYEE HEALTH AND SAFETY POLICY .....</b>	<b>19</b>
<b>EVALUATION FOR EMPLOYEE JOB PERFORMANCE.....</b>	<b>22</b>
<b>FAIR BUSINESS PRACTICES, MONEY LAUNDERING, &amp; ANTI-BRIBERY AND FRAUD POLICY .....</b>	<b>26</b>
<b>LIVING WAGE POLICY .....</b>	<b>30</b>
<b>PRODUCT CARBON FOOTPRINT POLICY.....</b>	<b>32</b>
<b>PRODUCT END-OF-LIFE POLICY .....</b>	<b>34</b>
<b>RISK EXPOSURE TO MINORS POLICY .....</b>	<b>36</b>
<b>RSJ AND ERGONOMICS AT WORK POLICY .....</b>	<b>39</b>
<b>SCOPE 1 AND 2 REDUCTION TARGETS POLICY .....</b>	<b>41</b>
<b>SUSTAINABLE PROCUREMENT POLICY .....</b>	<b>43</b>
<b>WASTEWATER TREATMENT POLICY .....</b>	<b>46</b>
<b>WATER CONSUMPTION POLICY .....</b>	<b>52</b>
<b>WHISTLE BLOWER PROCEDURE .....</b>	<b>54</b>
<b>WORKING CONDITIONS POLICY .....</b>	<b>56</b>

**POLICY STATEMENT REGARDING  
Anti-Discrimination**

BioSpectra Inc., is committed to providing a work environment that is free from discrimination and harassment. Discrimination against employees, applicants, or clients on the basis of race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, age (40 or older), disability, genetic information, or any other characteristic protected by applicable law is strictly prohibited. This policy statement is also referenced in our BioSpectra Employee Handbook: Section 1.

We believe in treating all individuals with dignity and respect. Our anti-discrimination policy applies to all aspects of employment, including recruitment, hiring, training, promotion, compensation, benefits, and termination. It also applies to interactions with clients, customers, suppliers, and other stakeholders.

Managers, supervisors, and employees at all levels are responsible for implementing this policy and ensuring compliance with nondiscrimination principles. Any form of discriminatory behavior or harassment will not be tolerated and may result in disciplinary action, up to and including termination of employment or contract.

BioSpectra Inc., encourages employees to report any concerns or complaints about discrimination or harassment promptly. We will investigate all allegations thoroughly and take appropriate action. Retaliation against individuals who report discrimination or participate in investigations is also strictly prohibited.

Anonymous Hotlines are made available and promoted through the organization. BioSpectra, Inc. has implemented an electronic platform, called ReportIT, which provides employees with the opportunity to anonymously report concerns regarding discrimination and other related unwarranted conduct. As outlined in our Employee Handbook: Section 1 - Diversity.

**Continuous Improvement:**

We will continuously review and improve our policies, practices, and procedures related to anti-discrimination and safety in the workplace to ensure alignment with internationally recognized principles and best practices.



**Policy Review:**

This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of  
Commercial Operations**  
BIOSPECTRA

**POLICY STATEMENT REGARDING  
Biodiversity**

At BioSpectra Inc., we recognize the critical importance of biodiversity for the well-being of current and future generations. As a responsible supplier to the Pharmaceutical Industry, we are committed to the evaluation and preservation of land use and environmental impact regarding our current and future business expansion as part of our sustainability program. We will act with accountability as stewards for our local environment by protecting the biodiversity of our facilities and owned property. This policy is referenced in our Employee Handbook: Section 9- Workplace Safety and the Environment.

**Our Commitments:**

1. **Conservation and Protection:** Our facility in Bangor PA, USA is established within a 34-acre campus of wooded trees and typical undergrowth with the plan to maintain 99% of this in its' current state. In addition, any upgrades or improvements to the current facility is carefully assessed through and will comply with all State and Local standards and regulations regarding environmental impact. Further Information can be found in the Environmental Health and Safety Program BSI-SOP-0591, Section 4: 4.1.1 and 4.1.3: Environmental Health and Safety Management.
2. **Emissions Reduction:** We have set goals to reduce emissions within our facility by 50% as of 2030. We utilize biofilters in our manufacturing facility to mitigate air pollution in our direct environment.
3. **Education and Awareness:** We educate our employees and raise awareness among stakeholders about the importance of biodiversity conservation and our role in protecting it. Employee training hours are issued by the Training Department. The Training Department must prepare an annual report of these trainings and the hours of each employee trained.
4. **Transparency and Reporting:** We will transparently report our biodiversity performance, initiatives, and progress towards our goals to stakeholders and the public.

**Integration with Other Policies:** Our Biodiversity Policy is aligned with our broader environmental, social, and governance (ESG) commitments. We integrate biodiversity considerations into our Sustainability Program, operational planning, and risk management frameworks. BioSpectra, Inc.'s biodiversity efforts will be reported within our sustainability report.

**Leadership Commitment:** BioSpectra's leadership team endorses this Biodiversity Policy and holds itself accountable for ensuring its implementation throughout the organization.

**Continuous Improvement:** We will continuously review and improve our policies, practices, and procedures related to ecological protection and local biodiversity to ensure alignment with internationally recognized regulations and procedures.



**Policy Review:** This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of  
Commercial Operations**  
BIOSPECTRA

**POLICY STATEMENT REGARDING  
Chemicals & Waste**

**1 PURPOSE**

1.1 BioSpectra Inc., is committed to promoting the responsible management of chemicals and waste to protect human health, the environment, and ensure compliance with relevant regulations. This policy is referenced in our Employee Handbook: Section 9- Workplace Safety and the Environment.

**2 SCOPE**

2.1 This policy applies to all BioSpectra facilities located in the United States.

**3 GOVERNANCE**

3.1 Our leadership team endorses this Chemicals & Waste Policy and is committed to providing the necessary resources and support for its implementation throughout the organization. The leadership team works with the Sustainability Team to ensure policy implementation and success.

**4 PRINCIPLES**

4.1 **Safety and Health:** Prioritize the safety and health of employees, communities, and stakeholders in all aspects of chemicals handling and waste management. For further information regarding this please refer to our Standard Operating Procedure: Waste Handling SOP BSI-SOP-0161.

4.2 **Environmental Protection:** Minimize environmental impact by implementing sustainable practices that reduce emissions, pollution, and resource depletion. Identify environmental risks through material assessment and focus on limiting waste output from the operational activities of suppliers. For further information refer to our Standard Operating Procedure; Environmental Health, and Safety program, BSI-SOP-0591, sections 4.1 and 4.2.

4.3 **Compliance:** Adhere strictly to all applicable laws, regulations, and industry standards related to chemicals and waste management.

**5 CONTINUOUS IMPROVEMENTS**

5.1 Regularly review and enhance our processes, technologies, and procedures to improve efficiency and reduce environmental footprint. Strive to perform routine inspections of facilities for waste minimization and adherence to environmental regulations/protocol.

**6 OBJECTIVES**



**6.1 Reduce Chemical Usage:** Identify opportunities to minimize the use of hazardous chemicals through substitution, process optimization, and improved inventory management.

**6.2 Waste Minimization:** Implement practices to reduce waste generation, promote recycling and reuse, and ensure proper disposal of hazardous and non-hazardous waste. With a target of a 15% reduction in total waste by 2035 from a baseline year of 2027 as systems to accurately measure waste metrics are not yet in place.

6.2.1 Aim to limit the output of waste from the source through limiting the usage of natural resources across the supply chain.

6.2.2 Report Scope 3 greenhouse gas emissions via Green Project and Secaro to track our company's reduction efforts.

**6.3 Risk Management:** Conduct risk assessments to identify potential hazards associated with chemicals and waste and develop mitigation strategies accordingly.

**6.4 Employee Training:** Provide regular training and resources to employees to ensure they are knowledgeable about safe handling practices, emergency response procedures, and regulatory compliance.

## **7 RESPONSIBILITY**

7.1 Assign clear roles and responsibilities for the implementation and oversight of chemicals and waste management policies.

## **8 MONITORING AND REPORTING**

8.1 Establish monitoring mechanisms to track progress towards objectives, measure performance indicators, and report on outcomes to stakeholders.

## **9 STAKEHOLDER ENGAGEMENT**

9.1 Engage with employees, suppliers, customers, and communities to foster transparency, gather feedback, and promote shared responsibility for sustainable practices.

## **10 CONTINUOUS IMPROVEMENT**

10.1 We will continuously review and improve our policies, practices, and procedures related to proper handling of chemicals and waste standards to ensure alignment with internationally recognized principles and best practices.

## **11 POLICY REVIEW**

11.1 This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.





**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

A handwritten signature in dark ink, appearing to read "Paul DiMarco", located below the policy approval text.

**Paul DiMarco | Senior Vice President of  
Commercial Operations**  
**BIOSPECTRA**

**POLICY STATEMENT REGARDING  
Child Labor, Forced Labor & Human Trafficking**

**1 PURPOSE**

1.1 At BioSpectra Inc., we are committed to upholding the highest standards of ethical conduct in all aspects of our operations. As such, we unequivocally condemn the use of child labor and forced labor in any form. We recognize that child and forced labor are serious violations of human rights and are detrimental to the well-being of individuals and communities. Therefore, we affirm the following policy:

**2 SCOPE**

2.1 This policy applies to all of our U.S based facilities and those we do business or partner with including suppliers, vendors and contractors.

**3 IMPLEMENTATIONS**

3.1 BioSpectra has established a mechanism to report child labor and/or forced labor issues and inclusion of:

3.1.1 Confidentiality guarantee; our whistleblower program, further information regarding this can be found in the employee handbook, Section 1: Diversity.

3.1.2 Non-retaliation guarantee.

3.1.3 Dedicated and anonymous reporting channels to Human Resources and/or Regulator Compliance Departments (EHS and Security).

3.2 BioSpectra has an established a Whistle-blower policy that provides employees with a process to register complaints, ensures there will be a fair and objective investigation and there will be no retaliation for making a complaint. BioSpectra has implemented an electronic platform, called ReportIT, which provides employees with the opportunity to anonymously report violations of child labor, forced labor, and human trafficking.. Moreover, there are repercussions to any necessary party that has gone against company policy as stated in our employee handbook, Section 1: Diversity.

3.3 Refer to our Policy Statement on the employment and protection of Minors. It is the policy of BioSpectra Inc., not to employee child labor nor use of any forced labor or engage in any form whatsoever of human trafficking.

3.3.1 BioSpectra expressly prohibits the hiring of employees under the age of 18 and does not allow children to work at any level of the organization. All candidates must undergo appropriate screenings and background checks to ensure they are over the age of 18 prior to employment. Outlined in the BioSpectra Employee Handbook: Section 2 - Employment.



3.4 The company further prohibits the use of child labor in any part of its supply chain as detailed in our “Supplier Code of Ethics”. All employees, contractors, and suppliers are expected to comply with this policy and ensure that child labor is not condoned in the workplace, directly or indirectly.

- 3.4.1 BioSpectra adheres to the Federal Fair Labor Standards Act (FLSA) as well as all State child labor laws for the Commonwealth of Pennsylvania.
- 3.4.2 As an incorporated entity in the Commonwealth of Pennsylvania, BioSpectra adheres rigorously to all State laws and guidances of the Pennsylvania Dept. of Labor.
- 3.4.3 Similarly, BioSpectra adheres to all Federal Guidance and Laws pertaining to a company with over 50 employees.
- 3.4.4 Our employee hiring practices are documented in our Employee Handbook, Section 2.

3.5 Therefore, it is the responsibility of each and every employee to uphold the principles and policies of this document in every area of service and employment within the company.

#### **4 PROHIBITION OF CHILD LABOR**

4.1 We strictly prohibit the use of child labor in any part of our operations. Children under the legal working age in their respective countries shall not be employed by our company or our suppliers.

#### **5 PROHIBITION OF FORCED LABOR**

5.1 We prohibit any form of forced or compulsory labor. This includes situations where individuals are coerced to work through threats, physical or psychological abuse, or any other means of coercion.

#### **6 SUPPLIER RESPONSIBILITY**

6.1 We expect our suppliers and business partners to share our commitment to eliminating child and forced labor from their own operations. We will work collaboratively with suppliers to ensure compliance with these standards.

#### **7 VERIFICATION AND MONITORING**

7.1 We will implement rigorous processes to verify and monitor compliance with our policy against child and forced labor. This may include audits, assessments, and ongoing dialogue with suppliers and stakeholders.

#### **8 TRAINING AND AWARENESS**

8.1 We will provide training and awareness programs to our employees and suppliers to ensure understanding of our policy, the importance of ethical labor practices, and the identification and reporting of any violations.



## 9 REMEDIATION AND ACCOUNTABILITY

9.1 In the event that violations of this policy are identified, we will take immediate action to address the situation, including collaborating with suppliers to implement corrective actions and providing remedies to affected individuals.

## 10 TRANSPARENCY AND REPORTING

10.1 We are committed to transparency in our efforts to eliminate child and forced labor. We will report periodically on our progress, challenges, and outcomes related to this policy.

## 11 CONTINUOUS IMPROVEMENTS

11.1 We will continuously review and improve our policies, practices, and procedures regarding child labor, exploitation, and human trafficking to ensure alignment with internationally recognized principles and best practices.

## 12 POLICY REVIEW

12.1 This policy will be reviewed in the Fourth Quarter of each new year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of  
Commercial Operations**  
**BIOSPECTRA**

**POLICY STATEMENT REGARDING  
Conflict Minerals**

Conflict Minerals are defined in 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(e)(4) as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, or any other mineral or its derivatives determined to be financing conflict in the Democratic Republic of the Congo or an adjoining country. 3TG is defined as **Tantalum, Tin, Tungsten and Gold**.

**1. Scope:**

1.1 This policy applies to all BioSpectra facilities located in the United States and all raw materials sourced for the manufacture of BioSpectra products.

**2. Responsibilities:**

2.1 BioSpectra, Inc. does not knowingly source conflict materials that directly or indirectly finance armed groups in the Democratic Republic of the Congo or any adjoining countries. BioSpectra is committed to working directly with our suppliers to source raw materials responsibly and does not intentionally add or use any conflict minerals or 3TG in the BioSpectra manufacturing processes. Therefore, conflict minerals or 3TG are not expected to be present in any BioSpectra products.

**3. Implementation with our Supply Chain:**

**3.1 To further support this initiative, BioSpectra expects its suppliers to:**

1. Establish policies to source materials responsibly avoiding any conflict minerals or 3TG
2. Provide any information regarding conflict minerals or 3TG supplied to BioSpectra upon request
3. Adhere to any laws and regulations aligned with the Dodd-Frank Wall Street Reform and Consumer Protection Act, specifically Section 1502(e)(4)
4. Carry the same or similar process throughout their own supply chain

**4. Reporting and Accountability:**

4.1 Raw Material Supplier Qualification Questionnaire is distributed prior to any qualification of a new supplier. The Regulatory Department will evaluate the responses and will determine whether the supplier is considered a Low Risk, Medium Risk or High Risk.

4.2 Compliance with the Dodd-Frank Act regarding Conflict Minerals is addressed in the Supplier Code of Ethics (BSI-FRM-1229).

4.3 Addressed in the Supplier Code of Ethics; "Supplier shall also respond to any questionnaire on conflict minerals as required by BioSpectra".



**5. Integration with Corporate Strategy:**

5.1 The Conflict Minerals Policy is integrated into our broader corporate sustainability strategy. It aligns with our commitment to environmental responsibility, ethics, and responsible supply chain.

**6. Leadership Commitment:**

6.1 Our leadership team endorses this Conflict Minerals Policy and is committed to providing the necessary resources and support for its implementation throughout our supply chain. The leadership team works with the Sustainability Team to ensure policy implementation and success.

**7. Policy Review:**

7.1 This policy will be reviewed in the First Quarter of each new year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.

**8. Policy Approval:**

8.1 Authorized person name: Paul DiMarco, Senior Vice President of Commercial Operations

Paul DiMarco | Senior Vice President of Commercial Operations

BIOSPECTRA

June 1, 2026, Version 1.1

**POLICY STATEMENT REGARDING  
Conflict of interest**

**1 PURPOSE**

1.1 BioSpectra Inc., is committed to maintaining the highest standards of integrity and ethical behavior in all aspects of its operations. This Conflict of Interest Policy is designed to ensure that actual, potential, or perceived conflicts of interest are identified and managed appropriately to protect the interests of our organization, our suppliers and customers, its stakeholders, and the common trust. This policy statement is also referenced in the BioSpectra Employee Handbook: Section 6, Work Policies and Regulations.

**2 SCOPE**

2.1 This policy applies to all directors, officers, employees, volunteers, and anyone acting on behalf of BioSpectra Inc.

**3 DEFINITION OF CONFLICT OF INTEREST**

3.1 A conflict of interest arises when an individual's personal interests or responsibilities compete or interfere with their duties to the Organization. Conflicts can arise in various forms, including financial, personal, or professional relationships.

**4 RESPONSIBILITIES**

**4.1 Disclosure Obligations**

All stakeholders have a duty to promptly disclose any actual, potential, or perceived conflicts of interest to the Director of Human Resources. Alternatively, disclosure can be made to the President of the Organization, any Officer of the Company, any Divisional Vice President or Director who will promptly report it to the Director of HR for immediate action. Disclosure should include relevant facts and circumstances to allow for a thorough evaluation.

**4.2 Evaluation and Management**

The Director of HR shall review disclosed conflicts of interest to determine the appropriate course of action. Management strategies may include recusal from decision-making, modification of responsibilities, or other actions to mitigate the conflict.

**4.3 Annual Disclosure**

Each stakeholder shall annually reaffirm their understanding of this policy and disclose any new conflicts that may have arisen during the year.



#### 4.4 Confidentiality and Non-Retaliation

Information disclosed regarding conflicts of interest will be handled confidentially to the extent possible. BioSpectra Inc. prohibits retaliation against any individual who reports a conflict of interest in good faith.

### 5 REVIEW AND COMPLIANCE

5.1 This policy shall be reviewed periodically and updated as necessary to ensure its effectiveness. Compliance with this policy is mandatory for all stakeholders, and failure to comply may result in disciplinary action, up to and including termination or legal action where appropriate.

### 6 CONCLUSION

6.1 BioSpectra Inc., is committed to fostering an environment where conflicts of interest are identified, addressed, and managed effectively to uphold our mission and values. By adhering to this policy, stakeholders demonstrate their dedication to maintaining the trust and integrity upon which our organization is built.

### 7 CONTINUOUS IMPROVEMENT

7.1 We will continuously review and improve our policies, practices, and procedures related to the protection of interests of our organization to ensure alignment with internationally recognized principles and best practices.

### 8 POLICY REVIEW

8.1 This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

Paul DiMarco | Senior Vice President of  
Commercial Operations  
**BIO SPECTRA**



**POLICY REGARDING**  
**Customer Health and Safety**

**1 BACKGROUND**

1.1 BioSpectra is committed to protecting the health, safety, and well-being of our customers by ensuring that all products are manufactured and distributed in compliance with applicable quality and safety standards. We recognize that customer health and safety are fundamental to our business and are committed to maintaining a robust Quality Management System (QMS) that ensures product safety and compliance, with a target of maintaining 0 instances of product recall through 2030.

**2 SCOPE**

2.1 The implementation of this policy will be applicable to all U.S based employees and U.S based facilities involved in the production process and shipment of chemical ingredients.

**3 GOVERNANCE**

3.1 Our leadership team endorses this Customer Health and Safety Policy and is committed to providing the necessary resources and support for its implementation throughout the organization. The leadership team works with the Sustainability Team to ensure policy implementation and success

**4 IMPLEMENTATIONS**

4.1 BioSpectra aims to continue to provide safe high-quality product through a multitude of measures including commitments to:

4.2 Regulatory compliance with applicable requirements, regulations, and global quality standards to ensure product safety

4.3 Product traceability of raw materials and finished goods to ensure accountability throughout the supply chain

4.4 Transparent documentation including Certificates of Analysis, Safety Data Sheets, and support documentation to enable safe handling

4.5 Complaint investigation and corrective and preventative actions to prevent recurrence

4.6 Recall Preparedness including procedures and periodic mock recalls to ensure effective response

4.7 Employee competency through training of employees in GMP, quality standards, and product safety to ensure compliance



## 5 CONTINUOUS IMPROVEMENT

5.1 We continuously monitor and evaluate our progress towards our customer health and safety targets. We review and update our methodologies, strategies, and technologies to strengthen our Quality Management System and ensure the health and safety of our customers.

## 6 POLICY REVIEW

6.1 This policy will be reviewed in the Fourth Quarter of each year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

Paul DiMarco | Senior Vice President of  
Commercial Operations  
**BIOSPECTRA**

**POLICY STATEMENT REGARDING  
Employee Health & Safety**

**1 PURPOSE**

It is the policy of BioSpectra Inc., to protect and enhance the Health and Safety of each employee. BioSpectra Inc. is committed to ensuring the health, safety, and wellbeing of all our employees. We recognize that a safe and healthy work environment is essential for our business operations and the productivity of our workforce. Therefore, we strive to maintain high standards of occupational health and safety across all our workplaces, with a target of a 20% reduction in work related injury incidents by 2030 compared to 2023

**2 SCOPE**

2.1 This policy applies to all BioSpectra facilities located in the United States and all active employees.

**3 OUR COMMITMENTS**

**3.1 Prevention of Workplace Hazards:** We will identify and assess workplace hazards and take proactive measures to eliminate or minimize them through engineering controls, safe work practices, and administrative controls. More information can be found in the Employee Handbook: Section 9- Workplace Safety and the Environment.

**3.2 Compliance with Laws and Standards:** We will comply with all relevant health and safety laws, regulations, and industry standards applicable to our operations.

**3.3 Training and Awareness:** We will provide appropriate health and safety training to all employees to ensure they are aware of hazards and risks associated with their work and understand their responsibilities for maintaining a safe work environment.

**3.4 Incident Reporting and Investigation:** We encourage employees to report any incidents, near misses, hazards, or health and safety concerns promptly. We will investigate all incidents to determine root causes and implement corrective actions to prevent recurrence. For more information on BioSpectra's incident protocol, please see policy statements regarding Antidiscrimination and Child Labor, Forced Labor, & Human trafficking. Resolution of workplace conflicts are further explained in our policy statements regarding Diversity, Equity, and Inequality, Section 5.1: Compliance as well as our Whistleblower policy, Section 4.1 through 4.3: Implementations.

**3.5 Consultation and Participation:** We will consult and communicate with employees on matters relating to health and safety. We encourage employees to participate actively in promoting and maintaining a safe and healthy workplace.



**3.6 Emergency Preparedness:** We will establish and maintain procedures for responding to emergencies and ensure that employees are trained and prepared to respond effectively. BioSpectra Inc. provides annual immersive training on emergency situation such as fire prevention and proper procedures regarding facility malfunctions such as chemical spills.

## 4 RESPONSIBILITIES

**4.1 Management:** Management is responsible for providing leadership in health and safety, allocating adequate resources, and ensuring that health and safety policies and procedures are implemented and maintained.

**4.2 Supervisors:** Supervisors are responsible for ensuring that health and safety policies and procedures are followed within their areas of responsibility and for providing guidance and support to employees.

**4.3 Employees:** Employees are responsible for following safe work practices, participating in health and safety training, reporting hazards and incidents, and cooperating with efforts to maintain a safe workplace. It is expected of employees to implement what they learn in their training to their work environment.

## 5 IMPLEMENTATIONS

5.1 Health and safety is supported, tracked and monitored through a series of metrics:

5.1.1 Annual OSHA report, incident reports – as they occur and reported to EH&S, documented quarterly review of Metrics by Sr. Management, Digital Signage program, anonymous “Whistle Blower” program

5.1.2 We prioritize the safety of our employees above all else. We adhere to all relevant health and safety regulations and provide necessary training to ensure that our workplace is free from hazards as referenced in our Standard Operating Procedure: Environmental Health and Safety Program BSI-SOP-0591, Sections: 4.1 and 4.2.

## 6 CONTINUOUS IMPROVEMENT

6.1 We will continuously review and improve our policies, practices, and procedures related to the health and safety of our employees to ensure alignment with internationally recognized principles and best practices.

## 7 POLICY REVIEW

7.1 This policy will be reviewed in the Fourth Quarter of each new year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations



**Paul DiMarco | Senior Vice President of Commercial  
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100 Majestic Way | Bangor, PA 18013

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BIOSPECTRA

June 1, 2026, Version 4.1

**POLICY STATEMENT REGARDING  
Evaluation for Employee Job Performance**

**1 PURPOSE:**

1.1 The evaluation of employee job performance at BioSpectra Inc., is a critical process aimed at assessing individual contributions, providing feedback for development, and aligning organizational goals with employee performance. The purpose of this policy is to ensure managers and employees are aware of the company's performance expectations as well as their respective responsibilities.

**2 SCOPE:**

2.1 This policy applies to all regular full-time and part-time employees of BioSpectra.

2.2 This policy statement is referenced in the BioSpectra Employee Handbook: Section 3, Working Hours and Pay.

**3 POLICY:**

3.1 Managers and supervisors are expected to establish performance planning. Their responsibilities include monitoring performance, ensuring employee development, evaluating employee's performance through employee ratings, and recognize employees individually for notable performance achievements.

3.2 Employees are expected to understand their job responsibilities. They are to be thorough in reviewing work and deliver on commitment. To implement this, they must utilize key performance behaviors.

3.2.1 The key behaviors are quality of work, job knowledge, delivers results, acts decisively, (drives) continuous improvement, promotes teamwork and develops oneself and others.

**4 FREQUENCY OF EVALUATIONS:**

4.1 Performance evaluations will be conducted annually for all employees, typically beginning in January through early February of that calendar year. Additional evaluations may be conducted at the discretion of management or as necessitated by specific circumstances (e.g., new role, significant change in job responsibilities).

**5 EVALUATION CRITERIA:**

5.1 Evaluations will be based on pre-established job requirements, key performance indicators (KPIs), annual Divisional, Dept., or individual Goals, and any additional competencies relevant to the employee's role.



## **6 COLLABORATION:**

6.1 It is the practice of BioSpectra to set annual goals for the Organization and Division. Further to that, Managers and employees may collaboratively set specific individual goals and objectives at the beginning of the evaluation period to guide the assessment process.

## **7 FEEDBACK AND DEVELOPMENT:**

7.1 Following the evaluation, feedback will be provided to the employee in a constructive manner, focusing on both achievements and areas needing improvement. Developmental goals and action plans may be established to support the employee's growth and career progression within the organization.

## **8 CORRECTIVE ACTION PROCESS:**

8.1 Evaluations will be typically conducted the employee's direct supervisor or manager. Evaluations will include a review of the employee's performance against established criteria, strengths, areas for improvement, and overall performance rating. Further Information regarding corrective action can be found in Employee Handbook, Section 2: Employment as well as BioSpectra Corrective Action Policy, Version 3.0.

8.2 The following steps in the Corrective Action process are designed to ensure managers and employees are accountable for resolving performance problems:

- 8.2.1 Problem Diagnosis & Resolution – The initial step begins with understanding the root cause of the problem and developing actions to resolve it.
- 8.2.2 Employee & Manager Accountability – Employees are expected to take accountability for their part in the performance problem, co-developing a plan with their manager and taking ownership for resolving it. Managers are responsible for addressing performance problems within their department, providing feedback to employees and providing support to resolve the problem.
- 8.2.3 Employee Commitment – Employees are expected to make a verbal commitment to resolve the performance problem and follow through with the agreed upon plan.
- 8.2.4 Documentation – Once the plan is developed and agreed upon, a summary of the plan and commitments of both the employee and the employee's manager are documented and signed.
- 8.2.5 Communicating Disciplinary Action – When it is determined that disciplinary action is appropriate, the manager communicates the level of the disciplinary action, and future consequences if the problem is not resolved. Disciplinary actions are documented and retained in the Human Development department.
- 8.2.6 Monitoring Progress – The manager and the employee meet periodically to review progress with respect to the employee's performance.



## **9 CORRECTIVE ACTION DOCUMENTATION & COMMITMENT:**

9.1 Corrective Action Plan Documentation – After a corrective action plan is developed, the manager is to document, summarize the plan and share it with the employee. If it is determined that disciplinary action is appropriate, the manager is to inform the employee as to the level of the disciplinary action.

9.2. Employee Commitment – Employees are expected to make a commitment to any reasonable plan to resolve the performance problem and sign a document signifying this commitment. If, at any point, in the corrective action process, the employee is unwilling to make a commitment to do this, the disciplinary action is immediately accelerated, at a minimum, to Suspension and Decision Leave.

9.2.1 When is an Unpaid Suspension with Commitment Appropriate? – When an employee has a prior reliable work history, it may be appropriate for the manager to give the employee time off to properly consider their commitment to resolve their performance problem. When no such history exists, BioSpectra will end the employment relationship with the employee.

9.2.2. Refusal to Make a Commitment – If an employee ultimately refuses to commit to resolving their performance problem, BioSpectra will end the employment relationship with the employee.

## **10 APPEALS PROCESS**

10.1 Employees who believe their evaluation is inaccurate or unfair may request a review with both their manager and Human Resources. This process allows for a fair and impartial reconsideration of the evaluation results. In addition, the employee may provide comments to be included with their performance evaluation.

## **11 TRAINING AND SUPPORT**

11.1 Managers responsible for conducting evaluations will receive training on the evaluation process, including providing effective feedback and conducting fair assessments.

11.2 Employees will have access to resources and support to help them understand the evaluation process and maximize their performance.

## **12 IMPLEMENTATIONS**

12.1 This policy shall be implemented under the direction of the Human Resources Department in collaboration with departmental managers. Regular review and updates to the policy may be conducted to ensure its effectiveness and alignment with organizational goals.





## 13 COMPLIANCE

13.1 All employees are expected to comply with this policy and participate fully in the evaluation process as outlined.

## 14 CONTINUOUS IMPROVEMENT

14.1 We will continuously review and improve our policies, practices, and procedures related to employee performance standards to ensure alignment with internationally recognized principles and best practices.

## 15 POLICY REVIEW

15.1 This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of Commercial Operations**

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BIOSPECTRA

**POLICY STATEMENT REGARDING**  
**Fair Business Practices / Money Laundering / Anti-Bribery and Fraud**

**1 PURPOSE**

1.1 BioSpectra is committed to conducting its business with honesty, integrity, and transparency. As part of this commitment, we adhere strictly to fair business practices and maintain a zero-tolerance policy towards bribery and fraud in any form. This policy statement is also referenced in our Employee Handbook: Section 6.

**2 SCOPE**

2.1 This policy applies to all BioSpectra facilities located in the United States and all active employees.

**3 GOVERNANCE**

3.1 Our leadership team endorses this Product Carbon Footprint Policy and is committed to providing the necessary resources and support for its implementation throughout the organization. The leadership team works with the Sustainability Team to ensure policy implementation and success.

**4 FAIR BUSINESS PRACTICES**

4.1 We conduct our business in compliance with all applicable laws and regulations, promoting healthy competition and fair dealings in the marketplace. Our employees are expected to uphold the highest standards of ethics and integrity in their interactions with customers, suppliers, partners, and colleagues.

**5 MONEY LAUNDERING**

5.1 We are committed to maintaining a zero-tolerance policy toward money laundering and activities to conceal the origin of illicit funds. We only conduct business with reputable partners and require transparency in financial transactions. We strive to maintain a target of 0 confirmed incidents of money laundering annually through 2030.

**6 ANTI-BRIBERY**

6.1 Bribery, whether offering, giving, receiving, or soliciting, is strictly prohibited. We do not tolerate any form of bribery or corrupt practices, including facilitation payments. Our employees are prohibited from offering or accepting gifts, hospitality, or any other inducements that could compromise their impartiality or judgment. Our stance on anti-bribery is upheld with a continued target of 0 cases of bribery annually through 2030.



**6.1.1 Gifting:** To avoid actual conflicts in the appearance of conflicts and undo influence, no employee shall accept any gift of notable value, in any form whatsoever (including services, loans, article, or promise), from a partner, costumer, supplier, or applicant of BioSpectra. Whether a gift is of a notable value will be determined by BioSpectra in its sole discretion. Any employee who receives a gift from a partner, costumer, supplier, or applicant to BioSpectra should immediately disclose the receipt of the gift to his/her supervisor. Further information can



be found in the BioSpectra Employee Handbook: Section 6, Work Policies and Regulations.

## 7 FRAUD PREVENTION

7.1 We are committed to preventing fraud in all aspects of our operations with a target of maintaining 0 confirmed fraud cases annually through 2030. This includes but is not limited to financial fraud, misrepresentation of information, falsification of records, and any deceptive practices. Employees are encouraged to report any suspected fraudulent activities promptly.

## 8 RESPONSIBILITIES

8.1 **Management:** The management team is responsible for establishing and maintaining effective controls to prevent bribery and fraud within the organization.

8.2 **Employees:** All employees are expected to familiarize themselves with this policy, understand their responsibilities, and conduct themselves accordingly.

8.3 **Reporting:** Any concerns or suspicions regarding potential violations of this policy should be reported immediately to Director of HR, the President of BioSpectra, Officer of BioSpectra, any Divisional VP or Director or use of BioSpectra Inc. confidential and anonymous “Whistle Blower” program. Which can be found in Employee Handbook, Section 1: Diversity.

8.4 **Training and Awareness:** We provide annual training and awareness programs to ensure that employees understand their obligations under this policy and are equipped to identify and prevent bribery and fraud.

8.5 **Monitoring and Review:** This policy is regularly reviewed to ensure its effectiveness and relevance. Feedback from employees and stakeholders is valued and considered in the ongoing enhancement of our anti-bribery and fraud prevention measures.

8.6 **Compliance:** Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contractual relationship, in addition to legal consequences where applicable.

## 9 APPLICATION

9.1 This Policy Statement applies to all employees, contractors, consultants, agents, and any other parties acting on behalf of BioSpectra. By adhering to these principles, we uphold our commitment to ethical business conduct and maintain the trust and confidence of our stakeholders.

## 10 CONTINUOUS IMPROVEMENT

7.1 We will continuously review and improve our policies, practices, and procedures related to fair business practices, fraud, and bribery practices to ensure alignment with internationally recognized principles and best practices.



## 11 POLICY REVIEW

11.1 This policy will be reviewed in the Fourth Quarter of each new year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Sr. Vice President

**Paul DiMarco | Senior Vice President**

**Commercial Operations**

[Paul.dimarco@biospectra.us](mailto:Paul.dimarco@biospectra.us)

**POLICY STATEMENT REGARDING  
LIVING WAGE**

**1 PURPOSE**

- 1.1 At BioSpectra Inc., we recognize the critical importance of ensuring that all employees earn a living wage that meets their basic needs. A living wage not only promotes financial stability and security but also fosters a more motivated and productive workforce.
- 1.2 We are committed to implementing and maintaining policies that ensure every employee receives compensation and essential benefits that allow them to meet their essential needs, including housing, food, healthcare, and transportation, with a target of retaining or minimum wage at 200-300% higher than the state mandate depending on starting position through 2030.

**2 SCOPE**

- 2.1 This policy applies to all employees and relevant stakeholders of BioSpectra, Inc.
- 2.2 This policy statement is referenced in the BioSpectra Employee Handbook: Section 3, Working Hours and Pay.

**3 POLICY**

- 3.1 Our commitment to a living wage extends far beyond compliance with legal requirements especially in the Commonwealth (State) of Pennsylvania. Our Minimum wage is 200-300% higher than the State Mandate depending on the starting position and this is supplemented with a very “rich” benefit package that includes highly compensated Health Insurance, 401K program and other benefits as detailed in our Employee Handbook because we believe it is our responsibility to provide fair and equitable compensation that reflects the true cost of living in our community.
- 3.2 BioSpectra, Inc. is committed to ensuring that at least of 90% of all employees earn a wage that meets or exceeds the established living wage standards.
- 3.3 We will regularly review our wage structures to ensure they remain competitive and reflective of economic realities.
- 3.4 “Living Wage” is not only a part of our Code of Ethics for BioSpectra Inc. but its also part of the Code of Ethics we ask our Suppliers and Distributors to endorse as we believe that a living wage is a cornerstone of social justice and equity worldwide.

**4 CONCLUSIONS**



4.1 BioSpectra is committed to upholding the principles of a living wage as an integral part of our overall mission and values. We will continue to advocate for fair compensation practices that prioritize the well-being and dignity of our employees.

4.2 The median compensation ratio of BioSpectra employees is 4:30 and the average compensation ratio is 3:85. This indicates that our employees are paid within the living wage threshold.

## 5 CONTINUOUS IMPROVEMENTS

5.1 We will continuously review and improve our policies, practices, and procedures related to living wage and employee needs to ensure alignment with internationally recognized principles and best practices.

## 6 POLICY REVIEW

6.1 This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of Commercial Operations**

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BIOSPECTRA

## **POLICY REGARDING**

### **Product Carbon Footprint**

At BioSpectra, we recognize the need to address climate change and reduce greenhouse gas emissions. As part of our commitment to environmental stewardship and sustainability, we have developed this Policy Statement to guide our efforts in measuring, reducing, and mitigating the carbon footprint associated with our products.

**SCOPE:** This policy applies to all BioSpectra facilities located in the United States and all active employees.

#### **Our Commitments:**

- 1. Measurement and Transparency:** We are committed to accurately measuring the carbon footprint of our products using internationally recognized methodologies.
- 2. Reduction Targets:** We set ambitious targets to reduce Scope I and Scope II carbon emissions along with the effort to reduce the carbon footprint of our products. Per SBTi guidelines, as a Small-to-Medium sized-enterprise (SME), we are not required to have Scope III target reduction goals. BioSpectra tracks upstream Scope III emissions and is working toward collecting data for partial (gate-to-gate) Product Carbon Footprint reporting. We intend to mitigate our emissions by 50% as of 2030 with a baseline of 2022 with offsets and other means of reduction. Tracking products' environmental impact will aid to reduce emissions and create an outline of what needs to be done in the future.
- 3. Innovation and Design:** We are taking into consideration carbon footprint collection or Life Cycle Assessments into future product design and development processes. This would include prioritizing high use materials with lower carbon intensity and optimizing our manufacturing processes.
- 4. Supply Chain Collaboration:** We are collaborating with our suppliers and partners to reduce emissions throughout our supply chain.
- 5. Education and Engagement:** We are educating our employees, suppliers, and customers about the importance of reducing product carbon footprints. This policy has been referenced in our Employee Handbook: Section 10, page 44-45 – Environmental Health Safety & Security.

**Implementation:** BioSpectra, Inc. has a goal to begin collecting data on partial PCF (gate-to-gate) assessments for each product that is manufactured in our facilities. The goal will then be to provide our customers with the information on our Product Carbon Footprint of the product they purchase. All product related direct (Scope 1) and indirect (Scope 2) greenhouse gas emissions of the production process will be included in the analysis.





**Reporting and Accountability:** We transparently report our product carbon footprint data, reduction progress, and achievements to stakeholders via a platform of our choice. The information will also be reported in our annual Sustainability Report that is located publicly on our website.

**Integration with Corporate Strategy:** Our Product Carbon Footprint Policy is integrated into our broader corporate sustainability strategy. It aligns with our commitment to environmental responsibility, resilience, and long-term value creation for our stakeholders. The use of Product Carbon Footprint analysis will provide proper data to further our initiatives in overall greenhouse gas reduction for our corporation.

**Leadership Commitment:** Our leadership team endorses this Product Carbon Footprint Policy and is committed to providing the necessary resources and support for its implementation throughout the organization. The leadership team works with the Sustainability Team to ensure policy implementation and success.

**Continuous Improvement:** We continuously monitor and evaluate our progress towards our carbon reduction targets. We review and update our methodologies, strategies, and technologies to achieve further emissions reductions and improve the accuracy of our carbon footprint assessments. Our PCF data will be updated at minimum every five years to ensure that our emissions information is accurate and precise.

**Policy Review:** This policy will be reviewed in the Fourth Quarter of each year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.

**Policy Approval:**

Authorized person name: Paul DiMarco, Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of Commercial Operations**

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**POLICY REGARDING**  
**Environmental Impact – Product End-of-Life**

**1 PURPOSE**

1.1 BioSpectra, Inc. is an organization committed to environmental sustainability and responsible corporate citizenship. As such, we recognize the environmental impact associated with the end-of-life phase of our Finished Good Products. This policy outlines our commitment to minimizing this impact through strategic initiatives and return policies, as part of our overall Sustainability Program. BioSpectra, Inc. is committed to reducing any environmental impact caused by end-of-life issues with Raw Materials or Finished Goods. This policy is referenced in our Employee Handbook: Section 9- Workplace Safety and the Environment.

1. **Environmental Responsibility:** We aim to minimize the environmental footprint of our products throughout their lifecycle, with a particular focus on end-of-life disposal and re-processing.
2. **Compliance:** In doing so, we comply with all relevant local, national, and international regulations concerning product return, reprocessing or disposal.

**2 SCOPE**

2.1 BioSpectra, Inc. has a long-standing return policy for expired finished goods material that can be re-used as raw material thus eliminating that Finished Product being shipped as waste by the end-user. For further information regarding the processes of this initiative, please reference BSI-SOP-0064 – Returned Goods Procedure. Every Finished Good Product manufactured by BioSpectra, Inc. has a validated manufacturing process that has been instituted within each validation step for reprocessing, returned, finished good materials in unopened containers.

**3 GOVERNANCE**

3.1 Our leadership team endorses this Product End of Life Reduction Policy and is committed to providing the necessary resources and support for its implementation throughout the organization. The leadership team works with the Sustainability Team to ensure policy implementation and success

**4 IMPLEMENTATIONS**

4.1 BioSpectra, Inc. also has a program in place to monitor and track the amount of raw material that has expired and requires discarding as waste. This is being conducted annually by the Supply Chain Division.

4.2 Each employee involved in BioSpectra’s manufacturing process is to be familiar with BSI-SOP-0292 – Manufacturing Process Validation Master Plan, Section 2: Objective as well as BSI-SOP-0319 – Material Reprocessing or Reworking Procedure, Section 7: Reprocess Procedure.



## 5 MEASUREMENT AND REPORTING

5.1 BioSpectra, Inc. will continue to measure the amount of material that is returned (for end-of-life issues) and discarded and raw material that has reached its expiry date and must be discarded.

1. **Metrics:** Year-on-Year metrics will be maintained with KPI reporting in our annual CSR.
2. **Transparency:** Through the CSR we will provide transparent reporting on our environmental initiatives and achievements related to product end-of-life management.

## 6 CONTINUOUS IMPROVEMENT

6.1 We will continuously review and improve our policies, practices, and procedures related to Product End-of-Life to ensure alignment with internationally recognized principles and best practices.

## 7 POLICY REVIEW

7.1 This policy will be reviewed in the Fourth Quarter of each year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of  
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BIOSPECTRA

**POLICY STATEMENT REGARDING  
Risk Exposure to Minors**

**1 PURPOSE**

1.1 It is the official hiring policy of BioSpectra not to hire Minors for permanent employment, defined as “persons under the age of Eighteen Years of Age”. Since it is legal to hire minors in the Commonwealth of PA with legitimate working papers under the conditions of the PA Child Labor Act, and since from time to time BioSpectra may allow the employment of an intern, who may be a minor and related to an employee in good-standing, or may allow a minor access to our facilities or volunteer at company events, or may work with a contractor or third party who interact with minors, we hereby institute this formal policy statement. This policy is referenced in the Employee Handbook, Section 2: Employment.

1.2 While the Pennsylvania Child Labor Act requires all minors ages to have a work permit to be legally employed it is the official hiring policy of BioSpectra Inc. that no person under the age of eighteen years of age, shall be employed and if such a person were to be allowed an exception (such as a High School Intern from a longstanding employee), that intern would never be exposed to safety or health risks for chemicals, pesticides, machines or tools, dust or excessive cold heat or noise.

1.3 At BioSpectra, we prioritize the safety and well-being of all our employees including by exception any minor in all our activities and operations. We recognize the vulnerabilities of minors and our duty of care, and have therefore developed the following policy as guidance to mitigate risk exposure:

**2 SCOPE**

2.1 This policy applies to all U.S based facilities, all employees, volunteers, contractors, and third parties who interact with minors in the course of their duties on behalf of BioSpectra Inc.

2.2 **Definition of Minors:** Minors are defined as individuals under the age of 18 years.

**3 GOVERNANCE**

3.1 Our leadership team endorses this Risk Exposure to Minors Policy and is committed to providing the necessary resources and support for its implementation throughout the organization. The leadership team works with the Sustainability Team to ensure policy implementation and success

**4 IMPLEMENTATIONS**

3.1 **Risk Identification and Assessment:** We conduct regular risk assessments to identify potential risks to minors involved in our programs, events, or services. Risks may include but are not limited to physical harm, emotional harm, abuse, neglect, or exploitation.



### **3.2 Preventative Measures:**

- 3.2.1** Hiring Policy: It is the official policy of BioSpectra Inc. not to employ on a regular basis or practice persons under the age of eighteen.
- 3.2.2** Screening: All individuals who have direct contact with minors undergo appropriate background checks and screening processes.
- 3.2.3** Background Checks: All candidates must undergo appropriate background checks which confirm age of employee.
- 3.2.4** Supervision: Adequate supervision is maintained to ensure the safety and security of minors at all times.
- 3.2.5** Code of Conduct: A clear code of conduct is established for all employees as defined in the Employee Handbook.
- 3.2.6** Anonymous and Direct Reporting: Human Resource access by all employees is direct and not withheld to allow for any reporting of suspicions or allegations of abuse or neglect, ensuring swift action and cooperation with authorities as required by law.

## **4 RESPONSE AND REPORTING**

4.1 Any concerns, suspicions, or allegations regarding the safety or well-being of a minor are taken seriously and addressed promptly and confidentially by Senior HR personnel. Reporting procedures are communicated clearly to all staff and volunteers.

## **5 COMPLIANCE AND REVIEW**

- 5.1 This policy complies with all applicable laws and regulations concerning the protection of minors. It is regularly reviewed and updated to reflect best practices and evolving standards.
- 5.2 It is the responsibility of all employees, volunteers, and relevant stakeholders to familiarize themselves with this policy and adhere to its provisions.

## **6 CONTINUOUS IMPROVEMENT**

6.1 By adhering to this policy, our goal and priority is to create a safe environment for minors involved in our programs and activities. BioSpectra Inc., is committed to continuous improvement in our safeguarding practices to ensure the protection of minors under our care.

## **7 POLICY REVIEW**

7.1 This policy will be reviewed in the Fourth Quarter of each new year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.



**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

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BIOSPECTRA

June 01, 2026, Version 3.1

**POLICY STATEMENT REGARDING  
RSJ (Risk Assessment and Safe Job) and Ergonomics at Work**

**Purpose:** The purpose of this policy is to ensure the health, safety, and well-being of all employees by implementing effective Risk Assessment and Safe Job (RSJ) practices and promoting ergonomic principles in the workplace.

**Scope:** This policy applies to all employees, contractors, visitors, and anyone else who may be affected by workplace activities. This policy is referenced in our Employee Handbook: Section 9- Workplace Safety and the Environment.

**Policy Statements:**

**1. Risk Assessment and Safe Job (RSJ) Protocols:**

- Regular risk assessments shall be conducted for all job roles and tasks to identify hazards, assess risks, and implement controls to mitigate those risks. BioSpectra, Inc. conducts confined space risk assessments prior to any activity of potential risk
- Employees shall receive adequate training on identifying hazards, reporting risks, and following safe job procedures. Relevant courses listed on MasterControl include BSI-0231 Hazard Communication Plan Training and BSI-0467 Employee Required Safety Training.
- Safe Job Procedures (SOPs) shall be documented and communicated to all relevant employees. These procedures should be reviewed regularly and updated as necessary. More information can be found regarding specific procedures in BSI-SOP-0591, Environmental Health and Safety Program, Sections: 4.3, Hearing Conservation and 4.4, Incident Reporting.

**2. Ergonomics:**

- The company is committed to providing ergonomic workstations and environments to minimize the risk of musculoskeletal disorders (MSDs) and other ergonomic-related injuries.
- Ergonomic assessments shall be conducted for all workstations and tasks where ergonomic risks are identified.
- Adjustments to workstations, tools, and equipment shall be made based on ergonomic assessments to ensure optimal ergonomic conditions for employees.
- Employees shall receive training on ergonomic principles, including correct posture, workstation setup, and safe working practices.

**3. Responsibilities:**

- It is the responsibility of the EH&S department to oversee all safe work practices and workplace ergonomics. Risk assessments are conducted routinely to ensure the safety of our employees and their direct environment.
- Management is responsible for providing adequate resources and support to implement and maintain effective RSJ and ergonomic practices.



- Employees are responsible for following safe job procedures, reporting hazards or ergonomic concerns, and participating in training programs related to RSJ and ergonomics.
- Health and Safety personnel shall monitor compliance with this policy, conduct regular inspections, and review RSJ and ergonomic practices to ensure continuous improvement.

**Implementation:** This policy shall be communicated to all employees upon induction and through regular training sessions. Managers and supervisors shall ensure that the policy is understood and adhered to within their respective departments. Compliance with this policy is mandatory, and any breaches will be dealt with according to the company's disciplinary procedures.

**Conclusion:** By adhering to this policy, we aim to create a safe and healthy working environment where employees can perform their jobs effectively and without unnecessary risk to their health and well-being. Effective implementation of RSJ and ergonomic principles is essential for achieving this goal and is a shared responsibility among all members of the organization.

**Continuous Improvement:** We will continuously review and improve our policies, practices, and procedures related to our company's risk assessments and proper ergonomics in the workspace to ensure alignment with internationally recognized principles and best practices.

**Policy Review:** This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations



**Paul DiMarco | Senior Vice President of Commercial Operations**

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BIOSPECTRA



**POLICY REGARDING:**

**Scope 1 and Scope 2 Reduction Targets**

**1 PURPOSE**

- 1.1 BioSpectra, Inc. understands the importance of and is committed to reducing our personal Greenhouse Gas Emissions and energy consumption through increasing efficiency during operations and other reduction pathways. To minimize our global impact, BioSpectra, Inc. has verified targets to reduce Scope 1 and Scope 2 carbon emissions by 42% from a baseline year of 2022 by year 2030 in accordance with the Paris Agreement. Our Organizational goal of Scope 1 and Scope 2 carbon emissions reduction is 50% by 2030.

**2 SCOPE**

- 2.1 This policy applies to all BioSpectra facilities located in the United States and all active employees.

**3 IMPLEMENTATIONS**

- 3.1 We have agreed to multiple commitments along these parameters with many key accounts. Specific efforts include the implementation of 100% renewable energy powered electricity by 2029 from a 2024 baseline.
- 3.2 BioSpectra, Inc. is currently registered with EcoVadis, SBTi, M2030, Net Zero Cloud, WorldFavor, and Emitwise as an effort to track, reduce and report our emissions.

**4 CONTINUOUS IMPROVEMENT**

- 4.1 Our company aims to provide material assessments regarding our purchase categories and the location of our suppliers via Emitwise. We intend to Supply Product Carbon Footprint (PCF) data in the future and will implement a policy regarding BioSpectra, Inc.'s PCF analysis.
- 4.2 We will continuously review our Scope 1 and Scope 2 carbon emissions and work towards reduction tactics to reach our future reduction goals.

**5 GOVERNANCE**

- 5.1 Our leadership team endorses this Product Carbon Footprint Policy and is committed to providing the necessary resources and support for its implementation throughout the organization. The leadership team works with the Sustainability Team to ensure policy implementation and success.

**6 REVIEW**



6.1 This policy will be reviewed in the Fourth Quarter of each new year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.

**Statement Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

A handwritten signature in dark blue ink, appearing to read "Paul DiMarco".

**Paul DiMarco | Senior Vice President of  
Commercial Operations**

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**BIOSPECTRA**

**POLICY STATEMENT REGARDING  
Sustainable Procurement**

**1 PURPOSE**

1.1 BioSpectra Inc., recognizes the profound impact our procurement decisions can have on the environment, society, and the economy. Therefore, we are committed to conducting our procurement activities in a sustainable and responsible manner, with a target of 100% of our suppliers to sign a supplier sustainability code of conduct by 2035 and a target of 75% of our key suppliers to fill out our Annual Key Supplier Survey by 2030.

**2 SCOPE**

2.1 All of BioSpectra Inc.'s locations and employees are within the United States. Our policy pertains to all employees and facilities located in the United States. This policy is referenced in our Employee Handbook: Section 9- Workplace Safety and the Environment. Our procurement team is organized by BioSpectra Inc. management and the Department of Portfolio Development and Sustainability.

**3 BACKGROUND**

3.1 BioSpectra Inc. is currently registered with EcoVadis, CDP, SBTi, M2030, Net Zero Cloud, WorldFavor, and Emitwise. We have committed to reducing our Scope 1 and Scope 2 carbon emissions by 42% by 2030 from a baseline year of 2022 with a goal of 50% in accordance with the Paris Agreement. We have agreed to multiple commitments along these parameters with many key accounts. Specific efforts include the implementation of 100% renewable energy powered electricity by 2029 from a 2024 baseline.

3.2 We reference our sustainability standards off of internationally acknowledged sustainability documentation. These social and environmental standards include, but are not limited to, the UN Global Compact as well as the UN Sustainable Development Goals. Our Sustainable Procurement Program is reinforced through our Supplier Code of Ethics and Key Supplier Audit qualification and audit program. Please refer to BioSpectra Inc.'s Corporate, Supplier and Distributor Code of Ethics for further information regarding environmental, social, and governance initiatives. For a more detailed procurement procedure please reference BSI-SOP-0599, Sustainable Procurement.

**4 RESPONSIBILITIES**

4.1 The Portfolio Development and Sustainability Department is responsible for the implementation and maintenance of this policy. In addition to this, the department will provide information on sustainable procurement activities and issues as well as develop an annual corporate sustainability report.



4.2 All BioSpectra, Inc. personnel involved in procurement activities are responsible for complying with the Sustainable Procurement policy. All BioSpectra, Inc. Leadership Team members are responsible for enforcing compliance with said procedures.

## 5 KEY PRINCIPLES

**5.1 Environmental Responsibility:** Our environmental responsibility includes maintaining air and water permits as per PA DEP/Federal regulation. We strive to minimize our environmental footprint by prioritizing products and services that are energy-efficient, resource-efficient, and minimize greenhouse gas emissions throughout their lifecycle. BioSpectra has committed to reducing our Scope 1 and Scope 2 carbon emissions by 42% by 2030 from a baseline year of 2022. Preference will be given to suppliers who share our commitment to environmental stewardship and sustainable practices.

**5.2 Social Equity:** We are dedicated to upholding human rights, fair labor practices, and promoting diversity and inclusion within our supply chain. In order to comply with acknowledged standards, we base our Labor standards on both the Universal Declaration of Human Rights in addition to the International Labour Organization of the UN. We seek suppliers who demonstrate respect for workers' rights, provide safe working conditions, and promote ethical labor standards.

**5.3 Economic Viability:** We aim to support local economies and communities by sourcing goods and services locally whenever possible. We also prioritize suppliers who demonstrate sound business practices and financial stability.

## 6 INTERNAL IMPLEMENTATIONS

**6.1 Supplier Engagement:** We will collaborate with our suppliers to foster transparency and encourage continuous improvement in sustainable practices. This includes providing guidance on sustainability criteria and monitoring supplier performance.

**6.2 Education and Training:** We will educate our procurement team and stakeholders on sustainable procurement practices to ensure awareness and compliance with our sustainability goals. Our policy will be integrated into employees' welcome training as well as their onboarding handbooks.

**6.3 Monitoring and Reporting:** We will establish metrics and regular reporting mechanisms to track our progress towards sustainable procurement objectives. This will include assessing the environmental and social impacts of our procurement activities.

## 7 EXTERNAL IMPLEMENTATIONS

**7.1 Visibility:** We will produce an annual sustainability report that outlines the company's emissions, sustainability initiatives, social commitment, and fair labor policies. The report will be publicly uploaded to BioSpectra's main website as an effort to provide transparency and take accountability for our environmental impact.



**7.2 Stakeholders:** We are prepared to provide any external stakeholder, such as customers, with material regarding our company's sustainable initiatives. We will require signatures from any prospective suppliers and distributors, ensuring their understanding of our sustainable procurement and goals. We will promote information regarding our company's sustainable procurement on our website.

**7.3 Customer Health and Safety:** As mentioned in BSI-SOP-0218, BioSpectra, Inc. has a supplier approval program that allows for open communication between BioSpectra and the supplier/customer to ensure the best quality of material is manufactured.

## 8 COMMUNICATION

8.1 This policy will be communicated internally to all employees and externally to stakeholders, demonstrating our commitment to sustainable procurement and accountability. By adhering to these principles and practices, we believe we can contribute positively to the environment, society, and the economy while maintaining the highest standards of business ethics and integrity

## 9 CONTINUOUS IMPROVEMENT

9.1 We will continuously review and improve our policies, practices, and procedures related to environmental stewardship, social equity, and our economic impacts to ensure alignment with internationally recognized principles and best practices.

9.2 Our company aims to provide material assessments regarding our purchase categories and the location of our suppliers via Emitwise. We intend to Supply Product Carbon Footprint (PCF) data in the future and will implement policy regarding BioSpectra, Inc.'s PCF analysis.

## 10 POLICY REVIEW

10.1 This policy will be reviewed in the Fourth Quarter of each new year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of  
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BIO SPECTRA

**POLICY STATEMENT REGARDING:**

**Wastewater Treatment**

**1 PURPOSE**

1.1 BioSpectra, Inc. aims to leave no trace of waste in water utilized during our production processes. All water waste produced by the company will adhere to Environmental Protection Agency (EPA) standards and be managed as per state laws and regulations entail. We maintain a target of 0 regulatory violations per year through 2030.

1.2 All wastewater produced by BioSpectra facilities must be properly disposed of in order to not affect native biodiversity or water systems throughout surrounding areas.

**2 SCOPE**

2.1 This policy applies to all BioSpectra facilities located in the United States.

**3 IMPLEMENTATIONS**

3.1 All generated wastewater will be neutralized in facilities prior to disposal. Water will be sampled by external laboratories to determine if ingredient levels are below reporting limit standards.

3.1.1 Reports of analysis can be seen in Figures 1 through 4 as provided below.

3.2 Process of non-hazardous salts/sugars and sodium hydroxide is to be washed from equipment and transferred to waste tank.

3.3 All necessary chemicals within waste waters are to be neutralized with Sulfuric acid 50% to pH 7. Laboratory must confirm pH value prior to shipment of waste materials.

3.4 Non-hazardous waste waters are to be sent to disposal facility, Passaic Valley Sewerage Commission, via vacuum truck.

3.5 Estimated amounts of gray water to be sent to disposal services per week is 5,000 gallons. It is estimated that 250,000 gallons will be sent per year.

**4 RESPONSIBILITIES**

4.1 It is of the responsibility of BioSpectra's Environmental Health and Safety Department to monitor and coordinate all water waste disposal initiatives.

4.2 Employees involved in the processing of materials which creates gray water are expected to clean equipment and properly dispose of it regarding the waste stream system as previous mentioned.



5 RELEVANT DOCUMENTATION

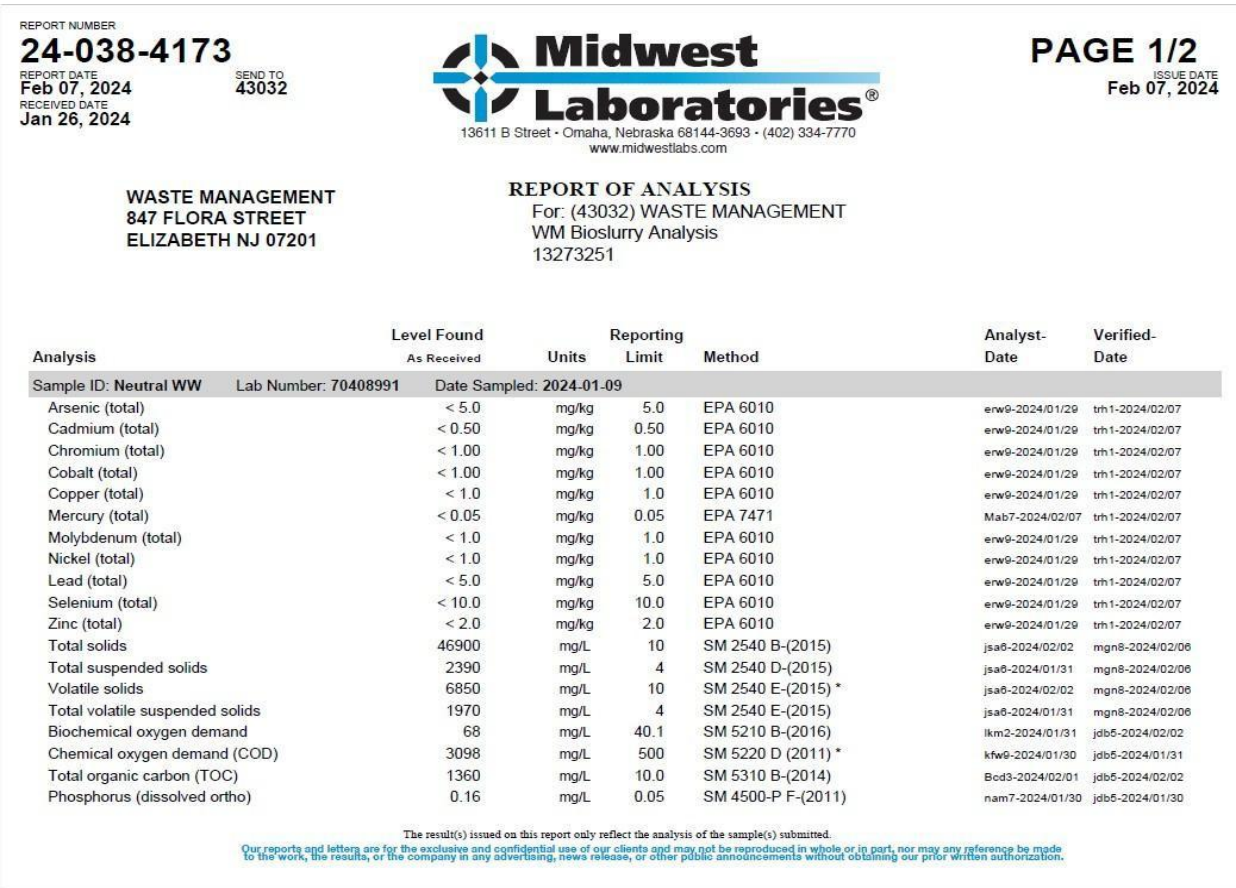


Figure 1: Report Number 24-038-4173



REPORT NUMBER  
**24-038-4173**  
REPORT DATE  
**Feb 07, 2024**  
RECEIVED DATE  
**Jan 26, 2024**  
SEND TO  
**43032**



PAGE 2/2  
ISSUE DATE  
**Feb 07, 2024**

WASTE MANAGEMENT  
847 FLORA STREET  
ELIZABETH NJ 07201

REPORT OF ANALYSIS  
For: (43032) WASTE MANAGEMENT  
WM Bioslurry Analysis  
13273251

Analysis	Level Found	Units	Reporting		Analyst- Date	Verified- Date
	As Received		Limit	Method		
Sample ID: Neutral WW	Lab Number: 70408991 (con't)					
Ammoniacal Nitrogen	217	mg/L	5.00	SM 4500-NH3 C-(1997)	pes0-2024/01/29	mgn8-2024/01/30
Total Kjeldahl nitrogen (TKN)	2600	mg/L	50.0	PAI-DK01 *	pes0-2024/01/30	mgn8-2024/01/30
pH	9.5	S.U.	0.1	EPA 9045D	ovn2-2024/01/30	mgn8-2024/02/06
Sulfide (releasable)	13	mg/kg	10	SW 846 CH. 7.3.4 (1994) *	kfw9-2024/02/06	mgn8-2024/02/06
Cyanide (releasable)	< 1	mg/kg	1	SW 846 CH. 7.3.3 (1994) *	kfw9-2024/02/01	jdb5-2024/02/01
Flashpoint	>95	°C	40	ASTM D 93	kak3-2024/01/30	lma2-2024/01/30
Silica Gel Treated HEM (SGT-HEM)	< 50	mg/L	50.0	EPA 1664 B	Gas9-2024/02/01	jdb5-2024/02/02

Sample(s) was prepared for EPA 6010 analysis by EPA 3050b.  
Unable to analyze entire contents of container for SGT-HEM analysis.  
All results are reported on an AS RECEIVED basis, ppm = parts per million, ppm = mg/kg, ppm = mg/L

For questions please contact:  
  
Cole C Parsons  
Account Manager  
cparsons@midwestlabs.com (402)829-9850

The result(s) issued on this report only reflect the analysis of the sample(s) submitted.  
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Figure 2: Report Number 24-038-4173 Page 2





REPORT NUMBER  
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**PAGE 1/2**

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WASTE MANAGEMENT  
847 FLORA STREET  
ELIZABETH NJ 07201

REPORT OF ANALYSIS  
For: (43032) WASTE MANAGEMENT  
WM Bioslurry Analysis  
13273251

Analysis	Level Found		Reporting		Analyst- Date	Verified- Date	
	As Received	Units	Limit	Method			
Sample ID: Non Haz Zone E	Lab Number: 70408992	Date Sampled: 2024-01-09					
Arsenic (total)	< 5.0	mg/kg	5.0	EPA 6010	erw9-2024/01/29	trh1-2024/02/07	
Cadmium (total)	< 0.50	mg/kg	0.50	EPA 6010	erw9-2024/01/29	trh1-2024/02/07	
Chromium (total)	< 1.00	mg/kg	1.00	EPA 6010	erw9-2024/01/29	trh1-2024/02/07	
Cobalt (total)	< 1.00	mg/kg	1.00	EPA 6010	erw9-2024/01/29	trh1-2024/02/07	
Copper (total)	20.0	mg/kg	1.0	EPA 6010	erw9-2024/01/29	trh1-2024/02/07	
Mercury (total)	< 0.05	mg/kg	0.05	EPA 7471	Mab7-2024/02/07	trh1-2024/02/07	
Molybdenum (total)	< 1.0	mg/kg	1.0	EPA 6010	erw9-2024/01/29	trh1-2024/02/07	
Nickel (total)	< 1.0	mg/kg	1.0	EPA 6010	erw9-2024/01/29	trh1-2024/02/07	
Lead (total)	< 5.0	mg/kg	5.0	EPA 6010	erw9-2024/01/29	trh1-2024/02/07	
Selenium (total)	< 10.0	mg/kg	10.0	EPA 6010	erw9-2024/01/29	trh1-2024/02/07	
Zinc (total)	16.0	mg/kg	2.0	EPA 6010	erw9-2024/01/29	trh1-2024/02/07	
Total solids	20100	mg/L	10	SM 2540 B-(2015)	jsa8-2024/02/01	mgn8-2024/02/06	
Total suspended solids	323	mg/L	4	SM 2540 D-(2015)	jsa8-2024/01/31	mgn8-2024/02/06	
Volatile solids	15900	mg/L	10	SM 2540 E-(2015) *	jsa8-2024/02/01	mgn8-2024/02/06	
Total volatile suspended solids	260	mg/L	4	SM 2540 E-(2015)	jsa8-2024/01/31	mgn8-2024/02/06	
Biochemical oxygen demand	1970	mg/L	219	SM 5210 B-(2016)	lkm2-2024/01/31	jdb5-2024/02/02	
Chemical oxygen demand (COD)	19390	mg/L	2500	SM 5220 D (2011) *	kfw9-2024/01/30	jdb5-2024/01/31	
Total organic carbon (TOC)	6070	mg/L	100	SM 5310 B-(2014)	Bcd3-2024/02/02	mgn8-2024/02/05	
Phosphorus (dissolved ortho)	21.0	mg/L	0.50	SM 4500-P F-(2011)	nam7-2024/01/30	jdb5-2024/01/30	

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Figure 3: Report Number 24-038-4174



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**WASTE MANAGEMENT**  
**847 FLORA STREET**  
**ELIZABETH NJ 07201**

**REPORT OF ANALYSIS**  
For: (43032) WASTE MANAGEMENT  
WM Bioslurry Analysis  
13273251

Analysis	Level Found As Received	Units	Reporting Limit	Method	Analyst- Date	Verified- Date
Sample ID: Non Haz Zone E      Lab Number: 70408992 (con't)						
Ammoniacal Nitrogen	2080	mg/L	50.0	SM 4500-NH3 C-(1997)	pes0-2024/01/29	mgn8-2024/01/30
Total Kjeldahl nitrogen (TKN)	4710	mg/L	50.0	PAI-DK01 *	pes0-2024/01/30	mgn8-2024/01/30
pH	7.7	S.U.	0.1	EPA 9045D	cvn2-2024/01/30	mgn8-2024/02/05
Sulfide (releasable)	< 10	mg/kg	10	SW 846 CH. 7.3.4 (1994) *	kfw9-2024/02/06	mgn8-2024/02/06
Cyanide (releasable)	< 1	mg/kg	1	SW 846 CH. 7.3.3 (1994) *	kfw9-2024/02/01	jdb5-2024/02/01
Flashpoint	>95	°C	40	ASTM D 93	kak3-2024/01/30	lma2-2024/01/30
Silica Gel Treated HEM (SGT-HEM)	< 50	mg/L	50.0	EPA 1664 B	Gas9-2024/02/01	jdb5-2024/02/02

Unable to analyze entire contents of container for SGT-HEM analysis.  
All results are reported on an AS RECEIVED basis, ppm = parts per million, ppm = mg/L

For questions please contact:

  
Cole C. Parsons  
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Figure 4: 24-038-4174 Page 2



## 6 CONTINUOUS IMPROVEMENT

6.1 We will continuously review and improve our policies, practices, and procedures related to proper handling of chemicals and waste in our processed water standards to ensure alignment with internationally recognized principles and best practices.

## 7 POLICY REVIEW

This policy will be reviewed in the First Quarter of each new year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of  
Commercial Operations**

100 Majestic Way | Bangor, PA 18013

[Web](#) | [LinkedIn](#) | [Map](#)

BIOSPECTRA

## **POLICY REGARDING**

### **Water Consumption**

#### **1 BACKGROUND**

1.1 BioSpectra understands that water is a critical natural resource and an essential ingredient in the manufacture of pharmaceutical products. We are committed to responsible water stewardship to minimize environmental impact and ensure long-term operational sustainability through process efficiency and other reduction pathways. BioSpectra has set a water intensity reduction target of 15% (Gallons/MT of Production) by 2035 from a 2026 baseline.

#### **2 SCOPE**

2.1 The implementation of this policy will be applicable to all U.S Based manufacturing facilities involved in the production process of chemical ingredients.

#### **3 GOVERNANCE**

3.1 Our leadership team endorses this Water Consumption Policy and is committed to providing the necessary resources and support for its implementation throughout the organization. The leadership team works with the Sustainability Team to ensure policy implementation and success

#### **3 IMPLEMENTATIONS**

3.1 BioSpectra aims to continue to track both total water consumption at a facility level and water intensity metrics with a near term goal of conducting a water audit at all U.S Based manufacturing facilities.

3.2 By conducting a water audit we intend to accurately map out our water use, identify areas of production with high intensity, and work to reduce consumption through more efficient equipment and processes.

3.3 Our facilities implemented an active leak identification and response system to minimize water loss and improve operational efficiency in both U.S based production sites at Majestic and Rockdale.

#### **4 CONTINUOUS IMPROVEMENT**

4.1 We continuously monitor and evaluate our progress towards our water consumption reduction targets. We review and update our methodologies, strategies, and technologies to achieve further water



use reductions and improve the accuracy of our water audit systems. Our water audit will be updated at minimum every 2 years to ensure that our water consumption information is accurate and precise.

## 5 POLICY REVIEW

5.1 This policy will be reviewed in the Fourth Quarter of each new year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of Commercial Operations**

**Office: +1.610.599.3477**

**Mobile: +1.610.442.0341**

**BIOSPECTRA**

## **POLICY STATEMENT REGARDING**

### **Whistleblower Procedure**

#### **1 PURPOSE**

- 1.1 It is the responsibility of BioSpectra, Inc. to ensure that it has a work environment that is safe, free of discrimination, illegal, and unwarranted conduct.
- 1.2 BioSpectra, Inc. has implemented a “See it, say it” report system to prevent any forms of unethical, abusive, or unprofessional behavior, illegal activity or other code of conduct violations or concerns.

#### **2 SCOPE**

- 2.1 This policy applies to all directors, officers, employees, volunteers, and anyone acting on behalf of BioSpectra, Inc.
- 2.2 This policy statement is referenced in the BioSpectra Employee Handbook: Section 1, Diversity.

#### **3 RESPONSIBILITIES**

- 3.1 Managers, supervisors, and employees at all levels are responsible for implementing this policy and ensuring compliance with nondiscrimination and ethical principles.
- 3.2 The enforcement of this procedure will be conducted by the BioSpectra’s leadership team. Human Resources or Senior Management will be informed of any reported issue and act accordingly.

#### **4 IMPLEMENTATION**

- 4.1 An Anonymous Hotline, ReportIT, is made available and promoted through the organization. BioSpectra utilizes this reporting platform to provide a way for employees to anonymously report concerns regarding discrimination, unlawful harassment, unethical, abusive, unprofessional and illegal conduct, as well as violations of child labor, forced labor, or human trafficking, as outlined in our Employee Handbook: Section 1 - Diversity.
- 4.2 Digital signage will be updated with postings throughout BioSpectra facilities educating employees on the ReportIT process. Each employee of BioSpectra will have the resources provided to anonymously report concerns.
- 4.3 Further information regarding the harassment definitions and complaint process can be found in the Employee Handbook: Section 1 - Diversity. The Whistleblower policy is cross listed in policy statements regarding Anti-discrimination, Fair Business Practices / Anti-Bribery and Fraud: Section: 5.3, Reporting, and Working Conditions: Section: 5 Feedback and Reporting.





## 5 CONTINUOUS IMPROVEMENT

5.1 We will continuously review and improve our policies, practices, and procedures related to the health, safety, and inclusion of our employees to ensure alignment with recognized principles and best practices.

## 6 POLICY REVIEW

6.1 This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of Commercial Operations**

100 Majestic Way | Bangor, PA 18013

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BIOSPECTRA

**POLICY STATEMENT REGARDING  
Working Conditions**

**1 PURPOSE**

1.1 BioSpectra Inc. is committed to providing a safe, healthy, and productive work environment for all employees. We believe that good working conditions contribute to the well-being of our employees and are essential for achieving high levels of performance and job satisfaction. This policy is referenced in our Employee Handbook: Section 9- Workplace Safety and the Environment.

**2 KEY PRINCIPLES**

2.1 **Safety:** We prioritize the safety of our employees above all else. We adhere to all relevant health and safety regulations and provide necessary training to ensure that our workplace is free from hazards as referenced in our Standard Operating Procedure: Environmental Health and Safety Program BSI-SOP-0591, Section: 4.1.4. BioSpectra maintains a PA State certified Safety Committee, whose purpose is to provide a voice to employees through department representatives. These representatives help to identify actual or potential safety problems, unsafe conditions, unsafe behaviors, or process improvements. The committee then evaluates potential solutions and recommends appropriate actions. All employees have the opportunity to be involved with the Safety Committee. Reference Safety Committee By-laws BSI-MEM-0014, Section: 1.1, Membership.

2.2 **Health:** We promote the physical and mental health of our employees by offering wellness programs, ergonomic workspaces, and access to healthcare resources.

2.3 **Respect:** We foster a culture of respect and inclusivity where every employee feels valued and treated fairly, regardless of their background or position.

2.4 **Work-Life Balance:** We recognize the importance of work-life balance and encourage our employees to manage their time effectively. We offer flexible work arrangements where feasible to accommodate personal needs.

2.5 **Professional Development:** We support the professional growth of our employees through training programs, mentorship opportunities, and career advancement initiatives.

**3 RESPONSIBILITIES**

3.1 It is the responsibility of management to uphold and promote these principles throughout the organization. Managers are expected to lead by example and address any concerns related to working conditions promptly and effectively. Employees are encouraged to actively participate in maintaining a safe and healthy work environment by following established procedures, reporting hazards or incidents, and contributing to a positive workplace culture. For more information regarding Manager and





Employee requirements, please see policy statement regarding Evaluation for Employee Job Performance, Section: 3, Policy.

#### 4 IMPLEMENTATIONS

4.1 This policy applies to all employees, contractors, and visitors to BioSpectra premises. Regular reviews and updates will be conducted to ensure that our working conditions policy remains current and effective.

#### 5 FEEDBACK AND REPORTING

5.1 Employees are encouraged to provide feedback on working conditions through regular surveys, meetings with management, or anonymous reporting channels. All concerns will be taken seriously and addressed promptly.

#### 6 CONCLUSIONS

6.1 By adhering to these principles and fostering a supportive work environment, we aim to create a workplace where every individual can thrive professionally and personally.

#### 7 CONTINUOUS IMPROVEMENT

7.1 We will continuously review and improve our policies, practices, and procedures related to ethical labor standards to ensure alignment with internationally recognized principles and best practices.

#### 8 POLICY REVIEW

8.1 This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of Commercial Operations**

100 Majestic Way | Bangor, PA 18013

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BIO SPECTRA

**POLICY STATEMENT REGARDING:**

**Workplace Diversity, Equity, and Inclusion**

**1 PURPOSE**

1.1 BioSpectra, Inc. is committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion. Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well. We embrace and encourage our employees' differences and characteristics that make our employees unique.

**2 SCOPE**

2.1 This policy pertains to all full-time and part-time employees working within BioSpectra facilities.

2.2 This policy is referenced within the BioSpectra Employee Handbook: Section 1- Diversity.

**3 IMPLEMENTATIONS**

3.1 BioSpectra's diversity initiatives are applicable—but not limited to; our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity.

3.2 BioSpectra conducts training on Diversity, Equity, and Inclusion practices in the workplace. The training is conducting through e-learning and must be completed by each employee. Our course syllabus includes tool sets on building a diverse workplace, promoting inclusion in team spaces, and understanding the importance of equity. The training module will not be accepted as complete without a passing score on the module exam.

3.2 Varying diversity and inclusion efforts encouraged by BioSpectra include the following:

3.2.1 Respectful communication and cooperation between all employees.

3.2.2 Teamwork and employee participation, permitting the representation of all groups and employee perspectives.

3.2.3 Work/life balance through flexible work schedules to accommodate employees' varying needs.

3.2.4 Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.



## **4 RESPONSIBILITIES**

4.1 All employees of BioSpectra have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company sponsored and participative events.

4.2 All employees are also required to attend and complete annual diversity awareness training to enhance their knowledge to fulfill this responsibility.

4.3 Any concerns or suspicions regarding potential violations of this policy should be reported immediately to Director of HR, the President of BioSpectra, Officer of BioSpectra, any Divisional VP or Director or use of BioSpectra Inc. confidential and anonymous “Whistle Blower” program. Further information regarding this can be found in Employee Handbook, Section 1: Diversity.

## **5 COMPLIANCE**

5.1 Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action. Employees who believe they have been subjected to any kind of discrimination that conflicts with the company’s diversity policy and initiatives should seek assistance from a supervisor or an HR representative.

5.2 Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contractual relationship, in addition to legal consequences where applicable.

## **6 CONTINUOUS IMPROVEMENT**

6.1 We will continuously review and improve our policies, practices, and procedures related to workplace diversity, equity, and inclusion practices to ensure alignment with internationally recognized principles and best practices.



## 7 POLICY REVIEW

7.1 This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Senior Vice President of Commercial Operations

**Paul DiMarco | Senior Vice President of Commercial Operations**

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BIOSPECTRA