

1. Purpose

At Braeburn (“Braeburn” or “the Company”), we value the relationships with our vendors, business partners, contractors, consultants and any company or person (collectively “Third Party vendors”) working on behalf of the Company. Our Third-Party vendors play an integral role in helping to meet our commitment to conduct business with integrity and in full compliance with the laws and regulations that govern our business activities. As such, Braeburn expects that our Third-Party vendors uphold the same principles and ethical responsibilities set in our Code of Conduct in addition to their own applicable policies and standards.

2. Scope

This policy applies to all Third-Party vendors that create content intended for HCP, Payer or Patient consumption, have a role in creating that content or interact with customers on behalf of Braeburn, which can include but is not limited to vendors, business partners, contractors, consultants, healthcare professionals and any other non-Braeburn employee.

Braeburn employees who contract with Third-Party vendors should ensure that vendors are aware and trained on this policy and on Braeburn’s Code of Conduct and should monitor and report any violations accordingly to Legal/ Compliance.

3. Requirements

3.1. Third-Party Code of Conduct

Braeburn expects that our Third-Party vendors will:

- Abide by the same principles established in Braeburn’s Code of Conduct in all respects including general requirement, conflicts of interest, protection and proper use of company assets, fair dealing practices, compliance with laws, rules and regulations,
- Effectively communicate the Code’s standards and training requirements to their employees and subcontractors, as applicable.
- Exercise appropriate supervision and oversight of their employees and subcontractors to make sure that any work performed for Braeburn is consistent with our Code’s standards; and
- Ensure that their employees and subcontractors adhere to all laws, rules, and government regulations applicable to the Third Party’s business and the products or services it provides to Braeburn.
- If there is a conflict between the terms of Braeburn’s Code and the written contract between Braeburn and the Third-Party vendor, the terms of the contract will control.

3.2. Reporting Violations

Third Party vendors should report in good faith, and act to correct, any suspected violations of regulations and applicable laws. Suspected violations must be reported in a timely manner to their Braeburn contact or anonymously using our Anonymous Hotline without fear of retaliation.

3.3. Compliance

This Third-Party Code is not intended to replace our Third-Party vendors’ existing policies or those of their subsidiary businesses, but to act as an additional set of governing principles. Third Parties should encourage their employees and agents to follow this Third-Party Vendor Code of Conduct as a

minimum standard. Braeburn has the right to investigate any reasonably suspected breach of this Third-Party Vendor Code and reserves the right to terminate its business relationship with any Third-Party who has violated the principles set out above.

4. Policy Compliance

Any exception to this policy must be approved by Braeburn's Legal or Corporate Compliance department in advance.

5. References

COC-2022-001 Code of Conduct

6. Attachments

N/A

7. Revision History

- Corrected repetition in 3.2 (23Sept22)
- Updated definition of applicable third-party vendors (15April2022)
- Annual Review – replaces V01 (15March2021)