

SUPPLIER CODE OF CONDUCT



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1 INTRODUCTION

The Kinapse Supplier Code of Conduct (SCoC) outlines the standards of business ethics for suppliers to Kinapse and supports development of a mutual understanding of how strong, ethical business relationships can be developed and sustained. Kinapse aims to develop mutually rewarding and sustainable relationships with our suppliers and within these relationships, we expect our suppliers to meet the high standards consistent with the values and culture of Kinapse.

This document sets out our minimal standards and these will be enforced contractually.

Suppliers are expected to impose along their supply chain an expectation similar to the values and expectations set out in this SCoC.

2 ETHICS

Suppliers are expected to conduct their business in an ethical manner and act with integrity.

2.1 Kinapse Values and Culture

Suppliers will make all staff supporting Kinapse aware of our mission, vision and values (these are documented on our website) and reinforce the importance which Kinapse places on demonstration of behaviours which are consistent with these. Kinapse encourages two-way feedback in respect of observed behaviours with its suppliers and will expect rapid remediation of any behaviours identified which are not consistent with our values or this SCoC.

2.2 Business Integrity

Corruption or malfeasance of any kind will not be tolerated in our suppliers. They will not offer or accept bribes or other unlawful incentives to business, individuals or governments. Suppliers will not offer Kinapse employees gifts or other personal benefits resulting from the relationship with them.

2.3 Fair Competition

Suppliers will conduct their business in line with fair competition and in compliance with relevant anti-trust laws and regulations. They will ensure that any advertising is accurate and truthful.

2.4 Data Privacy / Protection and Intellectual Property

Suppliers will safeguard and only make proper use of confidential information and will ensure that all the data subject's and business partner's privacy and intellectual property rights are protected. Where relevant to the service provided, they will safeguard patient privacy rights.

Suppliers will conduct their business in line with EU Data Privacy Directives, General Data Privacy Regulations or similar regulations presently in force and report immediately any breaches associated with Kinapse contracts to the Kinapse Chief Quality Officer. The Supplier will not transfer personal data outside of the European Union without first seeking the permission of Kinapse to do so.

2.5 Identification of Concerns

Suppliers will encourage all their workers to raise concerns and provide a suitable, easily accessible system to allow this. Reporting should be without threat of reprisal, intimidation or harassment. Suppliers will investigate and ensure that any corrective actions identified are followed through to conclusion.

3 LABOUR

3.1 Freely Chosen Employment

Suppliers will not utilise forced, bonded, indentured or involuntary prison labour. Suppliers will be expected to have a Modern Slavery and Human Trafficking Statement in line with that of Kinapse.

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3.2 Child Labour and Young Workers

Suppliers will not use child labour (*defined by the International Labour Organisation as "any work that deprives children of their childhood, their potential and their dignity and that is harmful to physical and mental development."*)

Any employees under the age of 18 are not to perform hazardous tasks.

3.3 Non-Discrimination

All suppliers' employees will be treated equitably. No employee will be discriminated against or unfairly advantaged for reasons of race, colour, age, nationality, descent, religion, caste, gender, disability, sex, sexual orientation, political affiliation, union membership, marital, pregnancy or parental status.

3.4 Fair Treatment

Suppliers will provide a workplace that is free from harsh and inhumane treatment, harassment, sexual abuse, corporal punishment, torture, mental or physical coercion or verbal abuse. Suppliers will ensure that there is no threat of any such treatment.

3.5 Wages, Benefits and Working Hours

Wages paid to the suppliers' employees will be according to applicable wage laws and will ensure an adequate standard of living. Suppliers will communicate to employees the basis on which they are being paid and any requirement for overtime and the wages to be paid for this. Employees will be paid in a timely manner.

Deduction from basic wage as a disciplinary measure will not be employed by suppliers unless stated otherwise in local laws (this does not exclude the entitlement to damages on a contractual or legal basis).

Working hours will not exceed the maximum set by applicable local laws and regulations.

It is expected that suppliers' employees will have open access to training and educational opportunities relevant to their career and personal development.

3.6 Freedom of Association

Kinapse encourages suppliers to communicate openly and directly with their employees and worker's representatives to resolve any workplace issues.

In accordance with local laws, suppliers will respect the rights of employees to associate freely, join or not join labour unions according to their choice, seek representation, join or not join works councils and engage in collective bargaining without threat of reprisal, intimidation, harassment, disadvantage or discrimination.

4 HEALTH AND SAFETY AND BUSINESS CONTINUITY

Suppliers will comply with all applicable health, safety and environmental regulations. All required permits, licenses and registrations will be obtained, properly maintained and updated as required.

4.1 Occupational Health and Safety

Suppliers will maintain a safe working environment and provide access to appropriate and properly functioning protective equipment and safety training where applicable.

Suppliers will use effective controls, safe working practices and procedures and ensure proper maintenance of all company facilities and equipment to prevent and mitigate health and safety risks. They will take appropriate action to mitigate known hazards and potential risks in the workplace.

Suppliers will ensure adequate protection from risks associated with any infrastructure used by their employees and will provide protective equipment where required.

4.2 Emergency Preparedness and Response

Suppliers will ensure that identified work place risks are fully assessed and documented. Where required, emergency plans and response procedures will be put in place. Suppliers will ensure that their employees

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are made aware of risks and are appropriately trained in these procedures, in order to ensure they are adequately protected. These procedures will be available for inspection as required.

5 ENVIRONMENT

Kinapse expects that all suppliers will operate in an environmentally responsible and sustainable manner, to minimise adverse effects on the environment and conserve natural resources.

Suppliers are expected to comply with all applicable environmental regulations and to obtain all required environmental permits, licences, information registrations and restrictions. All operational and reporting requirements will be adhered to.

5.1 Waste and Emissions

Suppliers will have systems and procedures in place to ensure safe handling, removal, storage, recycling, reuse and management of all waste, including air emissions and wastewater discharges.

Any waste, wastewater or emissions that have potentially hazardous effects on humans or the environment shall be appropriately managed, controlled and treated before release.

Systems and procedures will be in place to prevent and mitigate accidental spills and releases into the environment.

All procedures will be properly documented and adhered to by all staff.

5.2 Resource Conservation and Climate Protection

Suppliers will adopt working practices that use natural resources in an economical way; wherever possible they will reuse and recycle.

Suppliers will put in place and adhere to procedures to conserve the use of energy (e.g. reduce power consumption) in their day-to-day activities.

Suppliers will instil a sense of environmental responsibility in their staff.

6 MANAGEMENT SYSTEMS

Suppliers will adopt management systems that facilitate adherence to all applicable laws and regulations and promote continuous improvement with regard to the expectations documented in the SCoC.

6.1 Legal, Regulatory and Other Requirements

Suppliers will comply with all applicable laws, regulations, contractual requirements and generally recognised standards.

6.2 Commitment and Accountability

Suppliers will show commitment to the principles laid out in this SCoC by allocating appropriate resources and ensuring that all staff working on projects with Kinapse are aware of the SCoC.

6.3 Risk Management

Suppliers will implement mechanisms to identify and manage risks in the areas covered in the SCoC and all applicable legal requirements.

6.4 Information Technology

Suppliers will ensure that any IT systems and software utilised for work with Kinapse are up-to-date, fully protected and in line with current standards for IT security and safety.

Suppliers' employees will take all necessary steps to ensure that all sensitive / confidential information related to Kinapse and its clients is kept safe and secure, (e.g. memory sticks and computers should be password protected, devices containing confidential / sensitive information should not be left unattended etc.).

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6.5 Quality

Suppliers will implement systems and tools to manage their controlled documents, including SOPs, Policies and Quality Control documentation.

Suppliers will have programs in place to ensure they are audit and inspection ready. This will include potential audits from Kinapse and its clients. Suppliers will investigate and ensure that any findings and corrective actions or preventative actions identified are followed through to conclusion.

Suppliers will meet industry recognised and / or contractually agreed quality requirements when providing goods and services to Kinapse

6.6 Training and Competency

Suppliers will establish suitable training delivery and completion records in order to ensure that all employees have and can demonstrate, an appropriate level of knowledge and understanding of this SCoC, any applicable laws and industry recognised standards (e.g. GXP).

Kinapse will provide materials and support for training in Kinapse values, culture and expected behaviours, as appropriate.

6.7 Continuous Improvement

Suppliers are expected to demonstrate continuous improvement in their performance by implementing appropriate performance systems, measures and actions.

6.8 Documentation and Records

Suppliers will have appropriate access controls applied to its data storage and management systems.

Suppliers will have back-up systems in place for its data and communications (including e-mail and messaging) that are at least adequate to protect against loss of data and ensure that data and communications can be restored without undue delay or disruption to operations.

Suppliers are expected to have a records and information management system in place including a retention schedule and be able to impose a legal hold to defer deletion of data, e-mail, as required by Kinapse or a Kinapse client.

Suppliers are expected to keep and make available to Kinapse, adequate documentation to demonstrate adherence with and commitment to the values, principles and expectations set out in this SCoC.

6.9 Communication with External Parties

Any queries and communications between suppliers and external parties such as the media that relate to Kinapse or its clients, will be referred to the Kinapse Chief Financial Officer for Kinapse / Client resolution.