

BUSINESS ETHICS POLICY

Kimal believe that it is important for the organisation and its employees to maintain high ethical standards and, as such, Kimal is committed to both ensuring high ethical standards within the workplace and in the workplace of its suppliers. Kimal also strives for continual improvement and looks to its suppliers to do the same. This policy will be closely monitored and will be developed and updated as necessary to ensure that it meets the needs of the organisation, its employees and its stakeholders.

1. This policy will be reviewed on at least an annual basis, taking account of any changes within legislation, best practice, and government or regulator guidance.
2. Kimal will adhere to all relevant employment legislation and requirements within the UK and in any other jurisdiction within which it directly operates.
3. All employees are required to adhere to the organisation's policy and procedures on Business Ethics, a copy of which is made available to all employees and are made aware of this requirement as part of their induction process. In addition, all relevant managers and departments plus all Executive Board Directors complete relevant training which is mandatory and refreshed on an annual basis through our online training platform.
4. Policies relevant to this procedure are available to all employees on the organisation's Online Employee Communication Channel. Including: Data protection/Access to employee data, whistleblowing, anti-bribery (including the giving and receiving of gifts), confidentiality, relationships with competitors, suppliers, advertisers etc, equal opportunities, discrimination and harassment
5. Kimal is committed to equality of opportunity and diversity in the workplace. It is the organisation's policy to treat all job applicants and employees fairly and equally, regardless of their sex, chosen gender, pregnancy, maternity leave, age, sexual orientation, religion or belief, marital status, civil partnership status, race, colour, nationality, national origins, ethnic origin or disability.
6. Kimal is committed to safeguarding against human rights abuse within its operations and global supply chain through mandatory completion of Ethical trading assessments, UN country risk profiling and meeting obligations set out in contractual agreements and monitored at business performance reviews. We have undertaken reasonable practicable steps as part of our diligence process to monitor Modern Slavery, Slavery and Servitude, Forced and Compulsory Labour and Human Trafficking.
7. Kimal will not tolerate any form of bribery or corruption anywhere in its business, or in its supply chain. Kimal will never give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received, or accept any offer from a third party that is known or suspected to be made with the expectation that Kimal will provide a business advantage for their business or anyone else.
8. Senior Management will make available sufficient resources for the implementation and ongoing monitoring of this policy.
9. Kimal will ensure that all its key contractors, sub-contractors and suppliers are aware of this policy and, where relevant, have contractual obligations requiring their compliance with it.
10. Kimal, requires our suppliers to maintain appropriate ethical standards.
11. Kimal will take all reasonable steps to assess the ethical and employment standards of its suppliers, in alignment with the Ethical Trading Initiative (ETI) Base Code. This includes completion of the Ethical Trading Questionnaire and review of relevant NATLEX country risk profile data.
12. Based on information supplied to Kimal, we will source from suppliers who pass our due diligence checks, as outlined in our Modern Slavery policy, and who maintain appropriate ethical standards for the area in which they operate.

This policy will be made available via the Kimal company website, to the public and other interested parties. Should an interested party need to contact the Kimal ethics team please e-mail ethics@kimal.co.uk

Matthew Press
Chief Executive Officer
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KIMAL
delivering healthcare innovation