

# Supplier Code of Conduct

## Introduction

Apollo Medical Technologies Ltd ('the Company', 'we', 'us' or 'our') values our supplier relationships and is committed to working with, and supporting, our suppliers to achieve mutual objectives. A supplier's performance and adherence to high business standards is an important and integral part of the value chain for us. We promote and expect the application of high legal, ethical, environmental, and employee-related standards within our own business and among our suppliers.

## Scope

This Supplier Code of Conduct sets forth the minimum standards of business conduct that we expect from all our suppliers.

## Code

**1. Compliance with laws:** Suppliers shall comply fully with all laws and regulations applicable to them.

**2. Environmental sustainability:** we expect our suppliers to demonstrate a clear understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide:

2.1 Suppliers should have in place an effective environmental policy, statement, or program to mitigate environmental risks. The implementation of this should be evident with all employees at all levels of the company.

2.2 Suppliers should have processes in place to ensure that their operations conform to all applicable environmental legislation. All required environmental permits, approvals and registrations are to be obtained, maintained, and complied with in accordance with the conditions and requirements defined therein.

2.3 Environmental performance should be measured and reviewed regularly. The supplier should aim to make continued improvements in environmental performance through practicable measures.

2.4 Suppliers should make practical efforts to reduce the use of energy, water, and raw materials which should be sustainably sourced.

2.5 Emissions to air that are likely to cause pollution and or contribute to climate change should be measured and controlled where possible.

2.6 Suppliers shall make practical efforts to reduce levels of generated waste and should reuse and recycle waste materials wherever possible. The handling, storage, movement, treatment, and disposal of all waste must be carried out in accordance with applicable local regulations and in a responsible manner that does not cause harm to the environment.

2.7 Suppliers should consider the environmental credentials and performance of vendors within their own supply chain and require them to operate to a minimum set of standards.

2.8 Products and services provided to us should include options - whenever possible - that offer reduced environmental impact by utilising environmentally sound technologies, processes, and sustainable materials.

**3. Human rights and social sustainability:** Policies will be in place to confirm the supplier's commitment to the points below.

3.1 Freedom from forced labour, bonded labour, and human trafficking:

- All employment shall be freely chosen by the worker. Workers shall be free to leave their employment at any time (subject to reasonable and paid notice periods) and shall not be subject to any coercion or restriction through, for example, the holding of original copies of employee passports, identity documents or monetary deposits.
- There shall not be any use of bonded labour. Work must be undertaken for fair compensation and must not be undertaken to repay a debt incurred (i.e., because of deceptive recruiting practices).
- All employees shall be able to move freely without restrictions placed upon them.

3.2 Recruitment agencies: Where recruitment agencies/brokers are used by the supplier, appropriate due diligence and ongoing management must be undertaken to ensure that risks of worker exploitation, such as debt bondage, are effectively prohibited.

3.3 Child labour: Suppliers shall prohibit child labour and adhere to local laws relating to the minimum working age and not engage in the employment of child labour, directly or indirectly.

3.4 Wages and benefits: At a minimum, the legal minimum wage standard must be adhered to across the entire workforce, employees should receive clear information on their wages, and unfair deductions from wages as a disciplinary measure are not permitted.

3.5 Working hours: Working hours must be limited according to national or local law, including breaks. Compulsory overtime shall be prohibited as overtime should be voluntary, should not replace regular employment and must be compensated fairly.

3.6 Freedom of association, collective bargaining, or parallel means: Employees have the right to join or form a trade union without facing discrimination or intimidation. Where freedom of association and collective bargaining is restricted under law, employees should have the right to develop parallel means.

3.7 Health and safety and working conditions: A safe and hygienic working environment should be provided. Relevant training should be provided to employees.

3.8 Regular employment: All employees should be provided with a written employment contract setting out their terms and conditions in accordance with the local relevant legal jurisdiction. We expect all employment and the termination of employment to be carried out in a fair manner.

3.9 No harsh or inhumane treatment: Abuse, threat of violence, sexual abuse, other harassment, or intimidation shall be prohibited by suppliers. Suppliers shall make available to all workers within their operations and supply chain a mechanism for which grievances relating to labour practices can be anonymously raised, without fear of retribution. Suppliers shall investigate and take effective and appropriate action to remedy all grievances raised.

3.10 Subcontracting: Where authorised subcontracting is used, the supplier shall confirm that the subcontractor meets the minimum expectations set out in this document.

3.11 Right to audit: Suppliers shall attain the right to audit their suppliers to assess the working conditions and extent to which labour rights are being upheld. Records of audits undertaken of the suppliers' supply chain shall be available on request.

3.12 Incident response: Suppliers shall disclose the incident, firstly to the relevant authorities, and secondly to us, when an incident of forced labour, bonded labour, human trafficking, or child labour is identified.

3.13 Demonstration of reasonable modern slavery due diligence: We expect that our suppliers will maintain an active view on the inherent risk of modern slavery in their supply chain. Any supporting documents of due diligence shall be made available to us on request.

**4. Diversity and inclusiveness:** Our procurement decisions with suppliers will reflect and promote the company's values in that they will seek to ensure that suppliers do not victimise, harass, or discriminate against any employee or party to the supply chain due to their sex, gender identity/expression, marital or civil partnership status, race, ethnicity or national origin, disability, religion, sexual orientation, age or part-time status. Suppliers will be required to meet the requirements of any applicable discrimination legislation. All our suppliers will be treated fairly and equally.

4.1 We expect suppliers to have a policy in place that does not discriminate against the inclusion of individuals because of disabilities, religion, sexual orientation, race, or gender.

4.2 We expect suppliers to have a policy in place that explicitly bans discrimination/bullying and harassment based on disabilities religion, sexual orientation, race, or gender.

**5. Ethics:** The highest standard of integrity is expected in every area of our business. All forms of corruption, extortion, bribery (including facilitation payments), and embezzlement are strictly prohibited and may result in immediate termination and legal action:

5.1 Suppliers will not offer or provide money or anything of value to any person if the circumstances indicate that it is probable that all or part of the money or other thing of value is being given to another individual or entity to influence official action or to obtain a business advantage.

5.2 Suppliers must comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods and services (including software and technology). All invoices and any customs or similar documentation submitted to us or governmental authorities in connection with transactions involving us must accurately describe the goods and services provided and the price.

5.4 Suppliers shall not share or exchange any prices, costs, or other competitive information, or undertaking of any collusive conduct that relates to our company with any other third party.

5.5 Suppliers will only use subcontractors or other third parties who comply with all applicable laws and regulations, and who adhere to the same (minimum) standards set forth in this guide.

**6. Monitoring:** We may conduct annual compliance surveys to confirm compliance with this Supplier Code of Conduct. However, we expect that suppliers will actively audit and monitor their day-to-day management processes with respect to our Supplier Code of Conduct and provide evidence to us upon request.

Authorised by:

*Frederick Attwood*

Frederick Attwood

Managing Director

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