



Issued by:	Group Risk and Compliance	Version:	1.0
	Kelix Bio Code of Ethics	Effective Date:	1 st Oct. 2021

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DOCUMENT HISTORY

Date	Revision #	Author	Change made / Reason for change
25 th Aug. 2021	1.0	Irfan Ahmed	New Policy


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1. Purpose and Scope

- 1.1. This document explains how ethical standards and core values of Kelix Bio Limited (“KB”) should inform business decisions made within or on behalf of the company. It provides ethical guidance for employees when faced by confusing or controversial situations.
- 1.2. This KB Code of Ethics applies to the board of directors and employees at every level. The code is also applicable to all subsidiaries as well as anyone acting on KB’s or its subsidiaries’ behalf including contractors, distributors, and other third-party service providers.

2. Our Ethical Standards and Core Values


- 2.1. At KB we operate around five core values:
 - Commitment to Quality.
 - Act with Integrity.
 - Respect for people and the environment.
 - Responsibility for our actions.
 - Transparency in dealing with others.

3. Decision Making Under the Code of Ethics

- 3.1. When deciding within or on behalf of KB ask yourself the following:
 - Does it comply with relevant laws and regulations?
 - Does it comply with our code of ethics, our Code of Conduct, and other internal policies?
 - Does it reflect our values and ethical standards?
 - Does it respect the rights of others?
 - If my behaviour is made public, how would it be viewed by our stakeholders?
- 3.2. If you are unsure about any of the answers, please ask your manager or Human Resources or your Ethics and Compliance Officer for further guidance.

4. Reporting an Incident/ Speaking up

- 4.1. KB encourages a collaborative, speak up culture where employees ask questions, share challenges, and raise issues without fear of retaliation. KB is committed to treating reports seriously and investigating them thoroughly.
- 4.2. Board members, employees, stakeholders and all third parties are encouraged to report suspected unethical, illegal, or suspicious behaviour as soon as they become aware of it. KB does not tolerate retaliation against anyone who makes a good faith report or otherwise assists with an investigation or audit.
- 4.3. In case of an ethics breach, incident or concern employees are encouraged to report it to their line manager in the first instance, if possible, to ensure that concerns are handled in a timely and efficient manner. Incidents/ breaches/ concerns can also be reported directly to KB Risk and Compliance Director or the Head of Human

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Resources or the Ethics, Risk and Compliance Officer at subsidiaries, as applicable. It is also possible to report in line with KB's Whistle-Blowing Policy by writing at kb.whistleblowing@Kelixbio.com

5. Commitment to Quality

- 5.1. KB is committed to the pursuit of quality, not only in our products, but also in how we perform our duties and in our dealings with customers, shareholders, suppliers, colleagues, partners, and communities. The safety and quality of our products and services are essential to physicians and their patients and are key to our mission and values.

6. Act with Integrity

- 6.1. Employees are expected to act with integrity and honesty in their dealings with all parties with whom KB is connected and in all internal matters.
- 6.2. We demonstrate honesty, reliability, and fairness in our day-to-day business activities, both in our relationships with others and most of all between ourselves.
- 6.3. No employee should act in a manner that could harm KB's reputation. Employees are expected to avoid any personal, financial, or other conflicts of interest. that may interfere with their obligations to KB and its affiliated companies.

7. Respect for people and the environment


- 7.1. KB requires that human rights be respected in all its activities and business relationships. We operate without discrimination of any kind based on race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status such as disability, age, marital and family status, sexual orientation and gender identity, health status, place of residence, economic and social situation.
- 7.2. We follow applicable laws, policies, permits and regulations as they relate to protecting the environment, and conserving energy and natural resources, and we work to reduce the environmental impact of our operations everywhere we do business.

8. Responsibility for our Actions

- 8.1. Employees take responsibility and ownership for their actions and decisions as well as their consequences. Employees must exercise adequate control and supervision over matters for which they are responsible.

9. Transparency in dealing with others.

- 9.1. We engage actively with our employees and other stakeholders to ensure our operations remain transparent and consistent with the highest standards of corporate governance.

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9.2. Our relationships with our suppliers, customers, and other business partners should always be based on mutual trust and respect. We are open about what we have done and why we have done it.

10. Review and Amendments to the Code of Ethics

10.1. The Code of Ethics will be reviewed periodically and at least bi- annually. The amendments to the Code of Ethics is delegated to the Chair of the Audit and Risk Committee, who in consultation with management will report of any amendments to policy to the Board who are the final approval authority.