

Kindred Group Supplier Code of Conduct

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1. Introduction

Kindred operates in a regulated industry and we are committed to making sure everything we do is ethical and lawful, and that we work in a socially and environmentally sustainable way.

We view suppliers as an important part of our business success and strive to select and work with suppliers who adopt ethical standards, conduct their respective operations in a manner that respects the rights of the individuals they employ, demonstrate a positive impact on the environment and implement appropriate safety and security measures regarding personal data handling in accordance with the data protection standards.

That is why we have put together this code of conduct: to give you a good idea of what it means to work with Kindred as a supplier.

Our code is a set of principles that we expect our suppliers and their subcontractors to operate within. We will also consider these principles when we are choosing suppliers and we will be working together to monitor compliance throughout our relationship. Many of the principles in this code are about complying with laws and regulations. By this, we mean laws, regulations and industry best practices that apply in the jurisdiction that suppliers operate in. At Kindred, this compliance is the minimum standard we are looking for, and we can then work with our suppliers to improve things further. When we use the term 'suppliers', we are referring to the supplier company and any subcontractor employed by the supplier to work on Kindred business.

Wherever we are working regularly with suppliers, our aim is to make sure processes are in place to check that our principles are being followed and continually reviewed, and that there are solutions available for anything that needs to be put right. We will do this through our contracts with suppliers and a regular dialogue between key personnel at Kindred and the supplier. We might also use independent third parties from time to time to check that our suppliers are complying with our principles; any specific arrangements will be covered within the particular supplier contract with Kindred.

The principles contained within this code are not designed to provide an exhaustive list of our expectations of suppliers, just the things that matter most.

2. Our People

We are a company with a clear focus on diversity and equality, always striving to become better in every aspect. Today we operate a business with over 2000 employees representing 70+ nationalities, located across 12 locations. Being a truly diverse organisation creates an inspiring and creative environment allowing us to tackle challenges and meet our business objectives.

2.1 Fair Treatment and Equal Opportunity

We want Kindred to be a place of mutual trust and respect which embraces diversity and values everyone for their merits. A place where people's rights are honoured, and they are treated fairly and consistently.

We expect our suppliers to do the same. Suppliers' employees should never be abused, harassed or intimidated, and any disciplinary measures taken should be recorded. Employees

should have access to a written grievance or appeal procedure that's clear and easy to understand. Employees who are unable to read the procedure should be introduced to a suitable person, who can read it out and explain it to them.

Suppliers will not discriminate in hiring and employing workers on the basis of race, caste, birth, social or ethnic origin, religion, nationality, age, gender, gender identity or expression, marital status, sexual orientation, disability, maternity, union membership or political affiliation.

2.2 Health and safety

Suppliers will provide their employees with a safe and healthy workplace and should make sure a senior management representative is responsible for Health and Safety, and that appropriate policies and procedures are in place.

2.3 Human Rights

Respect for human rights is a fundamental part of how Kindred does business and our Governing Principles. We refuse to do business with any individual, company or organisation that violates the standards and principles of basic human rights or has links with an oppressive regime that give us cause for concern. We expect our suppliers to share this commitment and specifically meet the following.

- **Child labour**

Kindred does not use child labour and it expects its suppliers to do the same. We expect our suppliers to comply with local laws regarding the minimum age of employees. The minimum age for workers shall not be less than the age of completion of compulsory schooling, normally not less than 15 years or 14 where the local law of the country permits, deferring to the greatest age. In addition, Kindred Suppliers must comply with all legal requirements for the work of authorised young workers, particularly those pertaining to hours of work, wages and safe working conditions.

- **Forced Labour**

In line with our own commitment, Kindred Suppliers must not use any type of involuntary or forced labour, including indentured, bonded, slave or human trafficked labour, and never engage in any form of procurement of commercial sex acts. People must be free to terminate their employment in accordance with established laws, regulations, and rules. Kindred Suppliers should also not mandate that workers hand over government-issued identification, passports or work permits as a condition of employment.

Supplier's employees should be free to choose to work for their employer and to leave the company after they have given reasonable notice.

- **Wage and Benefits**

Kindred Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime hours at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate.

- **Employment Relationships**

Supplier's employees should have an easy-to-read contract of employment, which needs to comply with legislation and be particularly clear about wages. Employees who are

unable to read the contract should be introduced to a suitable person, who can read out and explain the contract to them.

- **Freedom of association and Collective Bargaining**

Kindred recognises the importance of open communication and direct engagement between workers and management and expects its suppliers to do the same. Kindred Suppliers are to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. We also expect our suppliers to recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing. Kindred Suppliers also must respect any legal right of workers to bargain collectively.

3. Our Business

Kindred is committed to the highest standards of integrity, honesty, openness and professionalism in all its activities wherever they are undertaken, we respect local laws and do not engage in any form of corrupt practices, including extortion, fraud, or bribery, at a minimum.

We expect our suppliers to uphold the highest standards of integrity, transparency and governance and, as a minimum, we expect our suppliers to comply with all relevant legislation and regulations.

Suppliers must not take part in forms of bribery or corruption and must not be associated with any group that supports acts of violence, terrorism or discrimination.

3.1 Gifts and Entertainment

The giving and receiving of gifts and entertainment can have a role to play in building business relationships and generating goodwill. However, they should never create improper influence or obligate the recipient. Kindred employees should not provide or accept excessive or inappropriate entertainment and must only ever offer or accept gifts that are of nominal value (<100 Euros). All gifts will be noted and tracked on a corporate gift register. Please refer to Kindred's Gift Policy for more information.

3.2 Conflicts of Interest

All Kindred employees owe a duty of loyalty to Kindred. Where our personal, social, financial or political activities interfere or could interfere with our loyalty to the company, a conflict of interest may exist. Even the appearance of a conflict can be damaging. Kindred employees and our suppliers should avoid situations where a conflict of interest may occur.

3.3 Bribery and improper payment

Kindred is committed to ethical business practices and has a zero tolerance for corruption and bribery. Kindred will not condone, under any conditions, the offering or receiving of bribes or any other form of improper payments, including what are known as 'facilitating payments'. In some jurisdictions, giving or receiving inappropriate gifts might constitute a criminal offence punishable with sentences as severe as imprisonment (up to 10 years of imprisonment and unlimited fine). Even the appearance of a breach of anti-bribery or anti-

corruption laws could do significant damage to Kindred's reputation and will be reported to the appropriate authorities as we see fit.

3.4 Competition and anti-trust

All Kindred suppliers must comply with all antitrust and competition laws which apply to our business.

3.5 Money laundering

It is Kindred's policy that any payment by Kindred to a vendor, supplier or other third party must be made to a bank account titled in the name of the contracted vendor, supplier or other third party.

3.6 Prevention of Tax Evasion

Kindred has a zero-tolerance policy for tax evasion and the facilitation of tax evasion. All Kindred suppliers and their associates must act in compliance with all tax laws and regulations in the jurisdictions in which they operate. We expect our suppliers to act carefully to prevent Kindred from being involved, used in or facilitating tax evasion or other criminal activities. Kindred suppliers must implement and maintain suitable measures and standards to prevent tax evasion and the criminal facilitation of tax evasion.

4. Data Protection and Security

4.1 Confidential

Kindred respects the confidential information of others and uses specific confidentiality clauses within its Supplier contracts. We will never seek to obtain or disclose the confidential information of other companies, whether it comes to us directly or from third parties and we expect our suppliers to operate in the same manner.

4.2 Data Protection

Kindred conforms to data protection standards set out by the European and/or national data protection legislation and implements strict security and safety measures to protect the data of its employees and customers alike. We will only work with suppliers who can demonstrate similar standards with regard to the protection of personal data.

4.3 Security Requirements

Kindred suppliers must implement the required security controls and related monitoring systems to prevent, detect and respond to security incidents. As a minimum suppliers must;

- Protect any Kindred assets including, but not limited to, hardware and software, with any means that are commercially viable.
- Report any security related incidents concerning Kindred assets.
- Upon request from Kindred share security related information material so that Kindred can perform a security assessment.
- Comply with any of the ISO 27001, NIST SP800-53 & SOC 2 Type I/II Report information security standards (or equivalent standards, if expressly agreed in writing by Kindred).

5. The Environment

Kindred seeks to comply with all relevant environmental legislation in the countries in which we are based, and we are committed to continually improving our environmental performance through various campaigns and initiatives across the company.

We believe suppliers should try to minimise any potential impact on the environment when supplying goods and services to us and demonstrate improvements in environmental performance on an on-going basis. As a minimum, we expect suppliers to seek to comply with applicable environmental legislation, regulations and directives to protect and improve the environment, and to have developed, reviewed and recorded processes in place to make sure they comply. We also expect suppliers to have action plans in place to continually improve their environmental impact including but not limited to the following areas:

- **Waste Management**
Minimise waste through careful purchasing and efficient use of natural resources and recycle as much waste as possible.
- **Energy**
Reduce the carbon footprint and save energy across offices including but not limited to improvement and upgrade to more energy efficient IT equipment and assets.
- **Transport**
Encourage employees to use sustainable transport, where possible reduce their travel and substitute it with video conferencing (and/or look to offset air emission via a registered organisation).
- **Environmental Awareness**
Raise employees' awareness of their individual and their company's overall impact to the environment and encourage their participation in initiatives aimed at improving any environmental impact.

Where appropriate, suppliers must also comply with additional environmental requirements specific to the products and services supplied to Kindred. Any specific requirements are outlined in the individual contract between Kindred and the supplier.

6. Our Supplier Engagement Process

We encourage suppliers to contact the Kindred Procurement Team at any stage of the contractual process and are available to discuss any of the above areas with suppliers.

We want to work together to improve our performance, our sustainability and limit our impact on the environment and we will endeavour to support continuous improvement with any supplier that needs help meeting the principles within this code.

We expect suppliers to keep reasonable records regarding initiatives and progress within these areas and Kindred may ask to access this documentation and raise reasonable enquiries from time to time.