

# Supplier Code of Conduct

## Code of Conduct for Suppliers 2025-26

### Brining Integrity To life

This Code outlines Chromis UK Limited's professional and ethical standards that our suppliers shall uphold. All suppliers of Chromis UK Limited, trading as Freeway Medical / Freeway Med-tech, are required to agree to this Code and must ensure that their supply chain complies.



## Doing Business Responsibly trafficking Statement

Suppliers must manage their business ethically and responsibly, act with honesty and integrity, and ensure that there is no bribery or corruption when conducting their activities. This includes accepting or giving bribes, using special influence for a particular outcome, corruption, extortion, or encouraging a contract breach with a third party. Suppliers must comply with the UK Bribery Act 2010, the US Foreign Corrupt Practices Act, and similar laws and regulations in all countries where they do business.

When working with Chromis UK Limited, all suppliers are obliged to inform us immediately about any attempt to bribe supplier personnel, including any attempt to receive corrupt payments (such as kickbacks) or the offer of any gifts, meals, travel, or hospitality that could be reasonably perceived as improper.

Suppliers must also effectively identify, prevent, and manage any actual or potential conflicts of interest to ensure that competition is not distorted, and that equal and fair business practices are upheld. Any potential conflicts of interest must be declared to Chromis UK Limited (including any personal or family relationships with Chromis UK Limited or client staff) throughout your relationship with us, including any changes to your declared conflicts of interest that may arise during the commercial lifecycle.

Suppliers must be committed to conducting their business in full compliance with antitrust and fair competition laws. Suppliers shall never engage in dishonest business practices intended to limit, or impair, open competition for the services and goods provided to Chromis UK Limited. Suppliers must not exchange current, recent, or future pricing information with competitors and shall not fix prices or rig bids.

Chromis UK Limited takes any anti-competitive behaviour very seriously and will cease any relationship with suppliers who breach these obligations. We will only maintain relationships with suppliers involved in legitimate business activities with funds derived from legitimate sources. Suppliers must comply with all local, national, and international laws and regulations relating to anti-money laundering, anti-terrorism, export, trade, arms control, non-proliferation of nuclear weapons, and trade sanctions that exist wherever the supplier undertakes business.

## Upholding Human Rights and Freedoms

Everyone is entitled to human rights without discrimination. Suppliers must always:

- Treat those they work alongside with dignity and respect;
- Communicate with respect and truth, and not be deliberately misleading;
- Comply with applicable laws concerning equal opportunities, child or forced labour, human trafficking, freedom of association, fair wages, and working hours;

• Uphold the values of all persons and conduct business in a socially responsible, non-discriminatory manner;

• And

• Speak up on suspicion of a human rights violation and have in place processes to ensure grievances can be addressed early and remediated effectively.

Suppliers must also ensure that there is no human trafficking or slavery in any part of their business and supply chain. Suppliers are required to confirm that they do not have operations in, or source goods or services from, high-risk countries classified in the Walk Free Global Slavery Index, where modern forms of slavery or human trafficking are more likely to occur. In applicable countries, we expect our suppliers to be a Living Wage employer and/or pay all directly employed staff at or above the currently established real Living Wage.

## Driving Inclusion and Diversity

We expect our suppliers to create a culture where workers feel inspired and empowered to collaborate in achieving the very best for their clients, Chromis UK Limited (and our clients), and the wider community. To promote the best outcomes, our suppliers must provide fair and equal treatment to all in hiring, promotion, training, compensation, termination, and disciplinary action. Suppliers must also not accept any kind of bullying, harassment, or coercion in their business.

Suppliers must not accept or tolerate any form of overt or covert discrimination by age, nationality, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation. Suppliers must be equal opportunity employers and value diversity amongst their personnel.

Suppliers must be committed to driving inclusion and diversity throughout their supply chain, endeavour to be active allies, and create a more inclusive culture that offers equal opportunities and supports diversity in all its forms.

We expect suppliers to avoid passing down unreasonable levels of risk to their subcontractors and not creating barriers for the use of small and medium-sized enterprises who are qualified to provide goods or services. This includes engaging small and socio-economically diverse suppliers—such as minority-owned (MBE), women-owned (WBE), disability-owned (DBE), veteran-owned (VBE), disabled veteran-owned (DVBE), service-disabled veteran-owned, LGBTQ+-owned, and other small businesses (SBA)—in sourcing activities where possible.

### Protecting the Environment

Our suppliers must share Chromis UK Limited's vision to build a positive human future. We expect our suppliers to understand and manage their environmental impact, including carbon, water usage, and resource consumption, both in their own operations and in their supply chain. Suppliers are also expected to adhere to all environmental laws and regulations in the jurisdictions in which they operate.

Suppliers are responsible for ensuring sustainability and environmentally-friendly practices within their supply chain. This includes promoting ethical sourcing, responsible production, and transparent supply chain management. Suppliers should actively engage with their supply chain to encourage sustainable practices and drive continuous improvement.

Chromis UK Limited is committed to reaching carbon net zero by 2040, and we may request data from our suppliers to improve the accuracy of our Scope 3 carbon footprint reporting, including evidence to support our carbon reduction initiatives. We have committed to the Science Based Targets initiative (SBTi), and we expect that all suppliers ensure their targets are aligned with the best climate science.

### Maintaining Confidentiality and Security

Suppliers must safeguard all information and equipment entrusted to them from Chromis UK Limited (and our clients) so as not to place us at risk. Suppliers must maintain the confidentiality of our and client information, ensure it always remains safe, and only allow authorised personnel to have access.

Suppliers shall adhere to all relevant security regulations and legislative requirements while working with Chromis UK Limited, including the Data Protection Act 2018 (UK), Computer Misuse Act 1990 (UK), Health Insurance Portability and Accountability Act of 1996 (US), and the General Data Protection Regulation (EU and UK).

Suppliers shall assist Chromis UK Limited in completing standard security due diligence on their personnel before providing information and/or equipment to such individuals. These checks may include the supplier providing information relating to criminal records, proof of identity, and the right to live and work in the country where personnel are employed. Suppliers shall follow these security procedures:

- When on Chromis UK Limited premises, suppliers are required to wear identification passes.
- If IT equipment is issued to the supplier, or access is provided to software or cloud services, the supplier's use shall be responsible, lawful, and within the directions of Chromis UK Limited.
- Suppliers must not install any unauthorised hardware/software/Cloud services on the equipment and be responsible when clicking unexpected links, attachments, or requests. At the end of the supplier's engagement with Chromis UK Limited, all issued IT equipment and information must be returned in full working condition.
- Suppliers are required to adhere to any additional Chromis UK Limited (or client) policies involving information security. This may include Assignment Security Plans, Software Development Life Cycle plans (if the supplier is working or developing software with client data), and any Data Handling Policies provided which may be relevant for a particular client, project, or site.

If suppliers become aware of any breach of this section, if data or equipment is lost/stolen, or if supplier IT systems are compromised in any way, they are required to notify [operationalrisk@chromisuk.com](mailto:operationalrisk@chromisuk.com) immediately with details of the breach and what data has potentially been compromised.

### Accurate Reporting

Chromis UK Limited relies on accurate reporting to enable us to make responsible decisions that affect our business and our people. Suppliers must not say anything false, artificial, or deliberately misleading in any records and ensure their accounts comply with accounting standards and best practices.

We expect suppliers to:

- Keep accurate, complete, and transparent records as reasonably requested by Chromis UK Limited (and our clients);
- Honestly record information and never make false or misleading statements for any reason; and
- Continue to follow the highest professional standards, best practices, and applicable laws in relation to account-keeping and record retention.

Suppliers are also expected to maintain and be able to provide Chromis UK Limited with reporting and documentation which demonstrates compliance with this Code. We may complete reviews and audits of suppliers upon reasonable notice to ensure that our standards are being met and this Code is being followed. In the event an audit is required

Signed on behalf of Chromis UK Ltd.

Date: 2<sup>nd</sup> January 2026

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