

SIMBEC-ORION

Code of Business Ethics

Introduction

At Simbec-Orion, we believe in doing the right thing. This Code of Business Ethics serves as our shared commitment to acting with integrity, fairness, and professionalism in everything we do. It guides employees, contractors, and partners to make responsible decisions, treat others with respect and honesty and live our Values. This is the foundation of our culture and our commitment to each other, our clients, our participants, and the communities we work in.

1. Integrity and Transparency

1.1 Honesty and Accuracy We are committed to being open and honest in everything we do. We share research data, reports, and updates that are accurate, complete, and reliable. Any attempt to mislead, omit key facts, or falsify information is strictly against our values and will not be tolerated.

1.2 Conflict of Interest If something outside of work may affect your work decisions, you should inform your Line Manager. We want to avoid any bias and make sure decisions are made fairly.

1.3 Transparency in Operations We are committed to openness in how we operate. Clear and honest communication with sponsors, regulators, participants, and any other party that we interact with is essential to building and maintaining trust.

2. Commitment to Quality and Compliance

2.1 Commitment to Quality Standards We adhere to the highest quality standards and legal requirements that guide clinical research including our MHRA Phase 1 Accreditation, including Good Clinical Practice (GCP), Good Clinical Practice for Laboratories (GCLP), and Good Manufacturing Practice (GMP). Quality is at the heart of everything we do, ensuring our work is reliable, ethical, and impactful.

2.2 Regulatory Reporting We meet all reporting obligations clearly, accurately, and on time. We are committed to remaining compliant and maintaining trust with our regulators.

2.3 No Bribes or Corruption We do not believe in shortcuts or unfair advantages. Bribery and corruption are not tolerated, no matter the situation.

3. Respect for Participants and Communities

3.1 Participant Welfare We place the highest importance on the wellbeing of our trial participants. We prioritise their safety, their rights and their privacy.

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3.2 Community Engagement Our work affects people and communities. We aim to build relationships based on mutual respect and understanding.

4. Professional Conduct

4.1 Teamwork and Respect We work together as a Tight-Knit Team, treating everyone with kindness, dignity and professionalism.

4.2 Communication We respect each other's time and priorities by keeping communication clear and purposeful, planning ahead, and protecting time for focused work, avoiding unnecessary meetings, overload of email, and last-minute requests.

4.3 Empowerment

We are committed to building an engaged, empowered, and collaborative team where our people feel inspired to thrive and succeed. We want to create an environment where everyone feels supported to take ownership and make meaningful contributions to our Company.

4.4 Continuous Learning We value continuous learning as a way to grow and improve. By being inquisitive and open to new ideas, we adapt to change, overcome challenges, and drive innovation. Our Forward-Thinking mindset ensures we are always developing the skills and knowledge needed to face the future with confidence.

4.5 Confidentiality We are committed to respecting and protecting privacy and confidentiality across all areas of our work, including participant data, corporate records, and sensitive communications. Protecting this information and keeping it secure is essential to earning and maintaining trust.

5. Environmental and Social Responsibility

5.1 Sustainability We care about the planet and reducing our environmental impact. Sustainability is part of how we operate and make decisions.

5.2 Making a Difference We aim to make a meaningful impact whether it is working with our clients to improve healthcare outcomes or contributing to the community around us. Caring Ambitiously means we set high standards, act responsibly, and look for practical ways to create positive change.

6. Speaking Up and Taking Responsibility

6.1 Raise Concerns Being radically honest means having the courage to speak up when something is not right. We have confidential systems in place so you can raise concerns openly and without fear.

6.2 Taking Responsibility We take ownership of our actions. When mistakes happen, we acknowledge them and take steps to put things right. If this Code of Business Ethics is breached, we will respond with actions that are fair, proportionate, and aimed at preventing future issues.

6.3 Continuous improvement We are not perfect, but we are focused on evolving and doing things better. This Code of Business Ethics is regularly reviewed and updated to ensure it stays current, effective, and aligned with our values and responsibilities.

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We are all expected to make choices that reflect our Values using good judgment, taking responsibility, and learning from experience. If you are ever unsure about a decision, ask yourself:

- Is it honest and fair?
- Does it align with our policies?
- Would I be comfortable if others knew?
- Does it feel right?

When in doubt, always consult your Line Manager.

Conclusion

This Code of Business Ethics guides us in how we think, how we work together, how we treat people, and how we succeed. Every one of us plays a role in living out these principles. By embracing our values of Caring Ambitiously, Tight-Knit Team, Dedicated to Delivery, Forward Thinking, and Radical Honesty, we are building trust, credibility, and a positive future for our Company and our industry.