

## Omicron Research Limited Supplier Code of Conduct

### Introduction

Omicron Research Limited ("Omicron") is committed to the highest standards of integrity and social responsibility, and Omicron expects all its Suppliers engaged in providing products and services to Omicron ("Suppliers") to have, or to make, a similar commitment. The Omicron Supplier Code of Conduct ("Code") describes Omicron's expectations of how its Suppliers conduct business. Omicron expects Suppliers to act in accordance with the Code, and at a minimum requires that all Suppliers comply with applicable laws and regulations within the geographies where they operate and be open and cooperative with the regulators enforcing such laws.

In instances where expectations outlined in the Code differ from local laws, Suppliers must follow these expectations within the bounds of applicable local laws.

### Overview

The Code reflects Omicron's values and sets forth what is expected of its Suppliers with respect to the following topics:

- Ethics and integrity
- Data Privacy and Security
- Inclusion and Diversity
- Employment and Working Conditions
- Wellbeing, Health and Safety
- Environment.

### Ethics and Integrity

Omicron is committed to the highest ethical standards and compliance with all applicable laws, rules, and regulations. In particular, Omicron requires Suppliers to adhere to the following standards:

#### Bribery and Anti-Corruption

Suppliers must fully comply with the requirements of all applicable bribery and anticorruption laws (e.g. Bribery Act 2010).

#### Gifts and Entertainment

Suppliers must not offer or accept any gift to obtain improper advantages or influence for the Supplier, Omicron (such as Omicron's employees and their family members and associates), or any third party. Gifts include a benefit, fees, commissions, dividends, cash, gratuity, services, or any inducements.

#### Whistleblowing

Omicron expects Suppliers to have a policy and process for reporting of workplace concerns (known as whistleblowing). The policy and process should be transparent and understandable and should protect reporting and participating individuals from retaliation.

## **Data Privacy and Security**

Omicron requires its Suppliers to protect the privacy of individuals and the security of confidential assets and information in line with the Data Protection Act 2018. Suppliers must protect Omicron's and its clients' confidential assets and information. Suppliers must design and maintain processes to provide appropriate protections for this information.

## **Inclusion and Diversity**

Omicron fosters an inclusive culture and believes diversity should be celebrated and discrimination of any form should not be tolerated. Suppliers must comply with all applicable laws relating to discrimination in hiring, employment practices, and harassment and retaliation.

Omicron fully complies with the Equality Act of 2010 and expects its Suppliers to do the same. Omicron expects Suppliers to operate workplaces free of discrimination, harassment, victimization, and any other abuse on any grounds including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, religious beliefs or union affiliation.

Omicron believes a successful inclusion and diversity program will improve recruiting success, positively impact employee retention, and drive successful company performance whilst supporting the wellbeing of all employees. By setting inclusion and diversity goals, Omicron is committed to measuring its progress toward creating an equitable workplace and holds itself accountable for achieving the following:

- Omicron will ensure equal pay and equal opportunity for all, regardless of sex, race, age, religion or belief, sexual orientation, disability, pregnancy/maternity, gender reassignment, marriage or civil partnership status with immediate effect.
- Omicron will ensure all staff attend regular diversity and inclusion training on induction and thenceforth at least annually, with the aim of improving awareness of diversity, equity, inclusion, and belonging issues in the workplace with the aim of eliminating all types of discrimination.
- Omicron will address racism, sexism, and other types of intolerance to support diversity and inclusion in the workplace. Effective immediately, Omicron will implement a zero-tolerance policy for any such behavior, with the aim of completely eliminating intolerance within the business.
- Omicron will ensure all recruitment is diverse and inclusive via inclusive job descriptions and advertising, diversification of recruitment sources, use of protected characteristic neutral language and awareness of unconscious bias in the interview process.

As one component of Omicron's commitment to advancing diversity and inclusion, Omicron actively promotes relationships with diverse and underrepresented businesses in Omicron's strategic sourcing and procurement process. Omicron searches for Suppliers that similarly value diversity in Suppliers' own supply chain and that support Omicron's goals with respect to supplier diversity.

## **Employment and Working Conditions**

Omicron does not tolerate slavery, forced labour, or human trafficking in any form. Omicron requires Suppliers to fully comply with the applicable legal requirements of slavery, forced labour and human trafficking laws (e.g., UK Modern Slavery Act 2015), and expects Suppliers to enact practices to ensure compliance with such laws.

Omicron does not tolerate child labour in any form. Suppliers must act in compliance with all laws regulating minimum working age, including any laws pertaining to the employment, apprenticeships, and internships of youths and students.

Omicron does not tolerate human rights violations in any form. Omicron expects Suppliers to enact practices to maintain a respectful and safe workplace. Omicron expects Suppliers to not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, bullying or harassment of any kind.

Suppliers must comply with all applicable wage and labour laws. Omicron expects Suppliers to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary and outsourced labour shall be in accordance with the law.

### **Wellbeing, health, and safety**

Omicron expects Suppliers to implement sound health and safety practices across business operations.

#### **Health and safety**

Suppliers must comply with all applicable health and safety laws and regulations. Omicron expects Suppliers to adopt practices to minimize health and safety risks, support accident prevention, and ensure a safe workspace for all workers.

#### **Environment**

Omicron is committed to reducing the impact of its operations on the natural environment and working with its Suppliers to do the same. Suppliers must comply with all applicable environmental laws and regulations. Omicron expects Suppliers to address Suppliers' environmental risk and impact. Omicron expects Suppliers to measure, manage, and address energy usage and greenhouse gas (GHG) emissions. And, where applicable, Omicron expects its Suppliers to measure, manage and reduce water and waste in its operations.

#### **Compliance with the Code**

Suppliers are required to promptly report to Omicron legal violations or violations of the Code or other Omicron policy.

Suppliers must promptly forward to Omicron, if permitted by law, any subpoenas, regulatory requests, media inquiries, or other third-party requests concerning Omicron.

To report a violation or other information, please email [office@omicron-uk.com](mailto:office@omicron-uk.com).

Omicron will keep the reported information confidential, provided it does not hinder any investigation and is permitted to do so by law.

#### **Supplier Selection**

Omicron will evaluate Suppliers' compliance with the Code during the Suppliers' evaluation and selection process, or upon Omicron's request.

## **Supplier Assessment**

During the Supplier approval process, Suppliers may be required to complete a self-assessment questionnaire on compliance with the Code. Suppliers may be asked to re-affirm compliance with the Code periodically. Upon request, Supplier will provide written information on its policies and practices related to compliance with the Code.

Omicron is committed to working with Suppliers to improve performance on topics addressed by this Code and expects Suppliers to agree to work together with Omicron to jointly address applicable and relevant topics.

## **Violations and Termination**

Supplier shall ensure that its subcontractors, if any, comply with the Code, and acknowledge that it is responsible for its subcontractors' violations. In the event of non-compliance with, or violation of, the Code, Omicron may give the Supplier a reasonable opportunity to respond with proposed corrective actions, unless the violation is severe or incurable, or there is a violation of law. Omicron may suspend or terminate its relationship with the Supplier and/or disclose the matter to the appropriate authorities if there is a violation of law.

## **Changes to the Code**

The Code is not meant to, and does not, supersede any applicable law, or any term in an agreement between Omicron and a Supplier. To the extent there is any conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement controls. Omicron reserves the right to update or change the Code requirements.

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