



1. PURPOSE

This Code sets out the standards of business conduct to which Krystelis operates and expects its employees, contractors, partners and vendors to act. Employees are expected to use this Code together with all relevant policies and procedures while carrying out their duties.

2. SCOPE

Applies to all Krystelis employees and others working on behalf of Krystelis.

3. POLICY

3.1 Our Vision

To help our customers improve the lives of patients by providing services recognised for quality, value, and collaboration

3.2 Our Values

- Integrity
- Respect
- Growing Together
- Proactiveness
- Openness

3.3 Build Trust and Credibility

Our success depends on the trust and confidence we earn from our employees, customers, and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching company goals solely through honourable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: Will this build trust and credibility for Krystelis? Will it help create a working environment in which Krystelis can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximise trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

3.4 Respect for the Individual

3.4.1. Creating an Inclusive Workplace Environment

We all deserve to work in an environment where we are treated with dignity and respect. Krystelis is committed to creating such an environment because it brings out the full potential in each of us and contributes directly to our business success.

3.4.2. Non-Discrimination, Diversity and Equal Opportunity

Krystelis is an equal opportunity employer and is committed to providing a workplace that is inclusive, diverse and free from discrimination of all types and from abusive, offensive, or harassing behaviour. We do not discriminate against any person because of their race, gender,

caste, religion, age, nationality, sexual orientation, disability, or any other trait protected by law. These commitments are rooted in the principles outlined in the [International Bill of Human Rights](#) including the [Universal Declaration of Human Rights](#) and the [International Covenant on Civil and Political Rights](#), as well as the [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#).

3.4.3. Promoting Inclusive Conduct Standards

All Krystelis employees are expected to support an inclusive workplace by adhering to the following conduct standards:

- Always treat others with dignity and respect.
- Address and report inappropriate behaviour and comments that are discriminatory, harassing, abusive, offensive, or unwelcome.
- Foster teamwork and employee participation, encouraging the representation of different employee perspectives.
- Seek out insights from employees with different experiences, perspectives, and backgrounds.
- Avoid slang or idioms that might not translate across cultures.
- Confront the decisions or behaviours of others that are based on conscious or unconscious biases.
- Be open-minded and listen when given constructive feedback about others' perception of your conduct.

3.4.4. Zero Tolerance Policy

Krystelis will not tolerate discrimination, harassment, or any behaviour or language that is abusive, offensive, or unwelcome.

3.5 Respect our Environment and Support Local Communities

Krystelis will fulfil all relevant statutory requirements related to Corporate and Social Responsibility.

We accept responsibility for the harmful effects our operations may have on both the local and global environment, and we are committed to reducing these. We will comply with all relevant environmental legislation. We will strive to measure and set targets for our impact on the environment and implement changes to reduce this.

Krystelis will preserve a budget, beyond statutory requirements, to make monetary donations to support the communities in which we operate and alleviate those in need.

Krystelis will encourage its employees to volunteer to support their local communities. We will provide flexibility in working hours so that employees can do this.

3.6 Create a Culture of Open and Honest Communication

At Krystelis everyone should feel comfortable to speak their minds, particularly with respect to ethical concerns. Managers have a responsibility to create an open and supportive environment here employees feel comfortable raising such questions. We all benefit when our employees use their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Krystelis will investigate all reported instances of questionable or unethical behaviour. In every instance where improper behaviour is found to have occurred, the company will act. We will not



tolerate retaliation against employees who raise genuine ethics concerns in good faith. Krystelis's Issue Raising (Whistleblowing) procedure (SOP-COR-03) describes how employees can raise any concerns of improper behaviour and how these will be investigated.

3.7 Set Tone at the Top

Krystelis leadership has the added responsibility for demonstrating, through their actions, the importance of this Business Code of Conduct. In any business, ethical behaviour does not simply happen; it is the product of clear and direct communication of behavioural expectations, modelled from the top and demonstrated by example.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Krystelis, we want the ethics dialogue to become a natural part of our daily work.

3.8 Uphold the Law

Krystelis's commitment to integrity begins with complying with laws, rules, and regulations where we do business. Further, each of us must understand the company policies, laws, rules, and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is allowed by law or Krystelis policy, we should seek advice. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Krystelis is committed to supporting drug and device development in compliance with all applicable laws, rules, and regulations. Our employees must follow standards, procedures and processes in drug, device and clinical trial documents including all applicable healthcare regulations and standard operating procedures.

Krystelis must always be inspection ready with respect to relevant and current Good Laboratory Practices, Good Clinical Practices, Good Research Practices, Good Pharmacovigilance Practices, Medical Devices, and all other requirements that apply to Krystelis business operations. We must maintain and follow our controlled documents implementing applicable regulatory requirements for, and adhere to, other regulatory association requirements as applicable and appropriate.

All work performed by Krystelis must prioritise patient safety, product quality, and data integrity. Employees are responsible for ensuring that all outputs are accurate, complete, and compliant with applicable regulatory standards.

Errors, omissions, or uncertainties must be identified, communicated, and addressed promptly to maintain compliance and protect patient wellbeing.

3.9 Competition

We are dedicated to ethical, fair, and vigorous competition. We will sell Krystelis services based on their value, superior quality, and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or ask for improper payments or gratuities in connection with the purchase of goods or services for Krystelis or the sales of its products or services, nor will we engage or assist in unlawful boycotts of customers.



3.10 Anti-Bribery and Corruption

Krystelis has zero tolerance for bribery and corruption. All employees and those acting on behalf of Krystelis must comply with applicable anti-bribery and anti-corruption laws, including the UK Bribery Act 2010 and other relevant international regulations.

Employees must not offer, promise, give, request, or accept any form of payment, gift, or advantage that is intended to improperly influence a business decision or secure an unfair benefit.

Employees must be mindful of the heightened expectations when working with pharmaceutical and healthcare clients, where strict rules apply to interactions, payments, and transfers of value.

Any concerns regarding potential bribery or corruption must be raised immediately in line with the Krystelis Issue Raising (Whistleblowing) procedure (SOP-COR-03).

3.11 Interactions with Healthcare Professionals

Where applicable, Krystelis will ensure that all activities involving or impacting interactions with healthcare professionals (HCPs) are conducted in accordance with applicable industry codes and regulations, including the ABPI Code of Practice, EFPIA Code, and any relevant local requirements.

Any work performed on behalf of pharmaceutical or healthcare clients must ensure that content, communications, and materials are accurate, balanced, and not misleading, and that they support appropriate and ethical engagement with HCPs.

Employees must be aware that additional requirements may apply depending on the client, project, or jurisdiction, and must follow all relevant contractual, regulatory, and client-specific obligations.

3.12 Third-Party and Supplier Conduct

Krystelis expects all third parties, including suppliers, contractors, and partners, to operate in accordance with standards consistent with this Code of Conduct.

Where relevant, Krystelis will perform appropriate due diligence and oversight to ensure that third parties act in a manner that upholds ethical business practices, regulatory compliance, and the protection of confidential information.

Employees engaging or managing third parties are responsible for ensuring that appropriate agreements, expectations, and controls are in place to mitigate risk and maintain compliance with applicable laws, regulations, and client requirements.

3.13 Proprietary Information

It is important that we respect the proprietary rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorised use, copying, distribution or alteration of software or other intellectual property.

3.14 Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material non-public information with respect to Krystelis, its securities, business operations, plans, financial condition, results of operations or any development plan.



3.15 Avoid Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the actions we take on behalf of Krystelis may conflict with our own personal or family interests. We owe a duty to Krystelis to advance its legitimate interests when we can. We must never use Krystelis property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Krystelis.

Other ways in which conflicts of interest could arise:

- Being employed (employee or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while employed with Krystelis.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for an outside commercial company or organization.
- Owning or having a substantial interest in a competitor, supplier, or contractor.
- Having a personal interest, financial interest, or potential gain in any Krystelis transaction.
- Placing company business with a supplier owned or controlled by a Krystelis employee or their family.
- Accepting gifts, discounts, favours or services from a customer/potential customer, competitor, or supplier, unless equally available to all Krystelis employees.

Deciding whether a conflict of interest exists is not always easy to do. Employees with a conflict-of-interest question should seek advice from their manager. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek advice from their manager.

3.16 Gifts, Gratuities and Business Courtesies

Krystelis is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favourable treatment of outside entities by Krystelis was sought, received, or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits given to or accepted from persons or companies with whom Krystelis does or may do business.

3.16.1. Accepting Business Courtesies

Most business courtesies offered to us in the course of our employment are offered because of our positions at Krystelis. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at Krystelis to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and goodwill with the firms that Krystelis maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who take part in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favouritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Krystelis participates in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Krystelis business.

3.16.2. Accepting Gifts

Employees may accept unsolicited gifts, other than money, which conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria, or money of any amount from entities with whom Krystelis does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than GBP 100 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to their manager.

3.16.3. Offering Business Courtesies

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Krystelis. An employee may never use personal funds or resources to do something that cannot be done with Krystelis resources.

We may give occasional business courtesies, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent giving of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as giving courtesies or entertainment to a client whose contract is expiring.
- The employee giving the business courtesy would feel comfortable discussing the courtesy with their manager or co-worker or having the courtesies known by the public.
- Accounting for business courtesies is done following approved company procedures.

We may provide non-monetary gifts (e.g., company logo apparel or similar promotional items) to our customers, unless this is not allowed within customer contracts. Further, management may approve other courtesies, including meals, refreshments, or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is accurately reflected on the books and records of Krystelis.

Employees must also ensure that any business courtesies comply with applicable industry codes (such as the ABPI Code of Practice and EFPIA Code), client-specific requirements, and contractual obligations. Where more stringent rules apply, these must be followed.

In all cases, business courtesies must be transparent, appropriately documented, and compliant with applicable laws and regulations.

3.17 Set Metrics and Report Results Accurately



3.17.1. Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, correct, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing, and signing or certifying the information contained therein.

Employees should, without delay, inform the Krystelis Leadership Team if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

3.17.2. Corporate Recordkeeping

We create, keep, and dispose of our company records as part of our normal course of business in compliance with all Krystelis policies and guidelines, (see POL-COR-05, Records Management) as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books following Krystelis's and other applicable accounting principles.

We must not improperly influence, manipulate, or mislead any unauthorised audit, nor interfere with any auditor engaged to perform an internal independent audit of Krystelis books, records, processes, or internal controls.

3.18 Promote Substance Over Form

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At Krystelis, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that Krystelis is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so.

Although Krystelis's guiding principles cannot address every issue or supply answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

3.19 Reporting Breaches to the Code of Conduct

Each of us is responsible for knowing and adhering to the values and standards outlined in this Code and for raising questions if we are uncertain about company policy.

Concerns or potential violations should be raised through one of the following channels:

- Line manager
- QA function
- Krystelis Leadership Team
- The formal Issue Raising (Whistleblowing) procedure (SOP-COR-03)

Krystelis encourages employees to raise concerns in good faith and will not tolerate retaliation against



individuals who do so.

Krystelis takes seriously the standards outlined in the Code, and violations are cause for disciplinary action up to and including termination of employment.

3.20 Data Privacy and Confidentiality

3.20.1 Data Privacy

Krystelis recognises the critical importance of safeguarding personal data in compliance with applicable data privacy laws, including but not limited to the General Data Protection Regulation (GDPR) in the European Union. This includes obtaining appropriate consent for the collection, processing, and transfer of personal data, as well as implementing robust security measures to protect against unauthorised access, disclosure, alteration, or destruction of personal data (as described in our Data Privacy and Protection Policy POL-COR-02).

3.20.2 Confidential and Proprietary Information

Integral to Krystelis's business success is our protection of confidential company information, as well as non-public information entrusted to us by employees, customers, and other business partners. This encompasses a wide range of sensitive data, including but not limited to pricing and financial data, customer names/addresses, or non-public information about other companies, including current or potential suppliers and vendors.

We are committed to ensuring that all confidential and proprietary information remains secure and is accessed only by authorised individuals for legitimate business purposes. Employees must not disclose confidential or non-public information without a valid business purpose and proper authorization.

3.20.3 Data Integrity

Krystelis is committed to ensuring the integrity of all data generated, processed, or reported as part of our services. All data must be attributable, legible, contemporaneous, original, and accurate (ALCOA principles).

Employees must ensure that data is recorded and maintained in a manner that is complete, consistent, and enduring, and that it supports transparency, reproducibility, and regulatory compliance.

Any concerns regarding data integrity, including errors, omissions, or inconsistencies, must be reported promptly in accordance with the Krystelis Issue Raising (Whistleblowing) procedure (SOP-COR-03).

3.20.4 Reporting and Compliance

Any concerns or questions regarding the handling of confidential information or compliance with data privacy laws should be promptly reported to the Krystelis Leadership Team according to the Issue Raising (Whistleblowing) policy (SOP-COR-03). We are committed to addressing such concerns in a timely and appropriate manner to ensure the continued protection of confidential information and the privacy rights of individuals.



3.21 Use of Company Resources

Company resources, including time, material, equipment, and information, are provided for company business use. Nonetheless, occasional personal use is permissible if it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Krystelis are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, in the conduct of any outside business or in support of any religious, political, or other outside daily activity, except for company-requested support to non-profit organisations.

To protect the interests of Krystelis and our fellow employees, Krystelis reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device and the use of the internet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate.

3.22 Media Inquiries

From time to time, employees may be approached by reporters and other members of the media. To ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to a member of the Krystelis Leadership Team. No one may issue a press release without first consulting the Krystelis Leadership Team.

3.23 Use of Social Media

Krystelis encourages employees to use social media channels to enhance their professional network and promote the best interests of the company. Employees should use good judgement when using social media to discuss work-related matters. All social media posts should maintain a respectful tone and not breach company confidentiality.

Employees must not disclose confidential information relating to Krystelis, its clients, or any projects, including unpublished data, proprietary information, or information subject to regulatory or contractual restrictions.

3.24 Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing follow the Krystelis guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- What would I tell my child to do?
- Is this the right thing to do?