

Supplier Code of Conduct

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1. Introduction and Purpose

Optima Health aims to work with suppliers who align with our values and support our goals. We expect our suppliers to adhere to all relevant legislation, to act responsibly, fairly, ethically and safely at all times.

These principles form an integral part of our sourcing activities and decisions. As part of our supplier onboarding and due-diligence process suppliers will be required to complete documentation and provide evidence of their adherence to this policy.

Our Supplier Code of Conduct sets out the behaviours and high standards we expect from our suppliers and their sub-contractors.

2. Legal and Regulatory Standards

We require our suppliers to comply with all laws and regulations applicable to its business and seek commitments from their own supply chain to also meet this requirement.

3. Human Rights

We are committed to upholding all laws relating to the protection of human rights including but not limited to the UN Universal Declaration of Human Rights. In line with our Modern Slavery policy, we are committed to preventing slavery and human trafficking from taking place in our supply chain. We expect our suppliers and their subcontractors to:

- Prohibit human trafficking and child or forced labour including modern slavery.
- Comply with all applicable wage and working regulations.
- Embrace diversity, fairness, and inclusion in their workforce/workplace.
- Support freedom of association in line with local regulations.
- Act ethically and with integrity and require their employees to do the same.
- Have robust policies in place that require their employees to adhere to relevant regulations and treat their own employees fairly and ethically.
- Have the ability to demonstrate robust procedures (appropriate for the size of their organisation) are in place to be confident that child labour, slavery or human trafficking is excluded from their supply chain.

4. Modern Slavery

We have a zero-tolerance approach to any form of modern slavery and hold our supply chain to the same standards. Modern Slavery policies and codes should include the following provisions:

- Adherence to local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibits any threat of violence, harassment and intimidation
- Prohibits the use of worker-paid recruitment fees
- Prohibits compulsory overtime
- Prohibits child labour
- Prohibits discrimination
- Prohibits confiscation of workers original identification documents
- Provides access to remedy, compensation and justice for victims of modern slavery

For advice and guidance we would encourage anybody within our supply chain to contact the Modern Slavery Helpline on 0800 0121700

We actively encourage openness and will support anybody from within Optima or our supply chain who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. You will not suffer any detrimental treatment as a result of reporting in good faith a suspicion that modern slavery is taking place in any part of the business or supply chain.

Any suppliers identified to be, in Optima's opinion, at high risk of modern slavery, may be required to demonstrate the robustness of their internal training on modern slavery and the steps they have taken to identify and address any risks within their business and their supply chain.

Any substantiated reports of modern slavery within a suppliers business or supply chain will result in immediate suspension of the supplier from the entire Optima Health group.

5. Ethical Sourcing and Behaviour

We expect all our suppliers to conduct business with integrity and incorporate the ethical and responsible behaviour and sourcing of goods and services into their processes and governance whilst complying with all relevant legislation. Suppliers will be expected to have appropriate policies (relative to the size of their organisation) in place to demonstrate robust governance.

6. Bribery and Corruption

We expect our suppliers to operate with integrity, comply with the Bribery Act 2010, and have appropriate policies in place to prevent fraud, bribery and corruption, money laundering, tax evasion and any other improper payments, or inducements within its business and seek to only work with suppliers that demonstrate similar commitments. Suppliers must not directly or indirectly offer improper payments or inducements to Optima employees that may give rise to actual, potential, or perceived conflicts of interest or engage in any other unethical behaviour.

7. Diversity and Inclusion

We expect our suppliers to abide by all relevant equality legislation and not discriminate based on age, sex or sexual orientation, gender identity, disability, origin, race, religion or belief in any employment or hiring practices. As a Disability Confident employer, we encourage you to be Disability Confident too, to challenge attitudes and increase understanding of disability.

8. Health and Safety

We expect suppliers to provide a safe and healthy working environment for their employees which meets the requirements of all applicable health and safety regulations and abide by all local laws and regulations including the Health and Safety at Work Act 1974.

Suppliers should ensure their employees receive the appropriate safety instruction and training to keep them safe and well in the workplace and have business management practices in place to address:

- Health and Safety Policy administration.
- Hazard identification, risk assessments and relevant procedures.
- Fire safety and emergency evacuation procedures.
- First aid and accident reporting procedures.
- Ergonomics.
- Clean and safe working conditions.

9. Environment

We recognise the role we play in protecting the environment and minimising our environmental impact. We expect suppliers to work together with their supply chains to appropriately minimise the environmental impact of their operations and ensure business practices meet all applicable environmental laws and regulations. We require our suppliers to comply with all applicable environmental legislation and regulations.

10. Confidential Information

We expect any information received by a supplier from Optima to be held securely with appropriate technical and organisational security in place to safeguard that information to ensure there is no disclosure of the data to any other party without our permission.

11. Clinical Suppliers – Standards, Registration and Evidence

Where Optima suppliers provide clinical treatments and/or services, the supplier shall use reasonable care, skill and diligence in providing and administering such services in accordance with evidence-based practice using appropriately experienced, qualified, registered and trained professional staff.