

## Supplier Code of Conduct

### 1. Introduction

This Supplier Code of Conduct (“Code”) sets out the comprehensive standards of ethical, social, environmental, and legal business conduct expected of all suppliers to SurgEase Innovations Ltd (“SurgEase”). This Code is directly linked to, and forms part of, the following agreements:

- -[INSERT CONTRACT NUMBER HERE]

Compliance with this Code is a contractual requirement under these agreements. This document reflects SurgEase’s commitment to upholding the highest standards in human rights, labour practices, environmental responsibility, anti-bribery, and modern slavery prevention, in accordance with the UK Modern Slavery Act 2015, UN Guiding Principles on Business and Human Rights, and our internal policies including the Modern Slavery Statement and Human Rights Statement.

### 2. Ethical Business Conduct

Suppliers must uphold the highest standards of ethics and integrity in all operations, including:

- Zero tolerance for bribery, corruption, extortion, or embezzlement.
- Prohibition of facilitation payments or improper advantages.
- Transparent, accurate, and verifiable record keeping.
- Fair competition in accordance with applicable laws.
- Avoidance of conflicts of interest, with full disclosure to SurgEase when such situations arise.

### 3. Modern Slavery, Human Rights, and Labour Standards

Suppliers must:

1. Prohibit and actively prevent all forms of modern slavery, forced labour, bonded labour, involuntary prison labour, exploitative child labour, and human trafficking.
2. Ensure all work is freely chosen, and workers are free to leave upon reasonable notice.
3. Adhere to all applicable employment laws regarding working hours, wages, and benefits.
4. Provide written contracts in the worker’s language.
5. Respect the right to freedom of association and collective bargaining without retaliation.
6. Maintain workplaces free from harassment, abuse, discrimination, or intimidation.

### 4. Health, Safety, and Environmental Responsibility

Suppliers must:

- Provide a safe and healthy working environment, including adequate lighting, ventilation,

sanitation, and emergency preparedness.

- Implement robust occupational health and safety management systems.
- Comply with all applicable environmental laws and regulations.
- Minimise environmental impact through efficient use of resources, responsible waste management, and pollution prevention.
- Support SurgEase's sustainability objectives and carbon reduction commitments.

## **5. Supply Chain Transparency and Due Diligence**

Suppliers are required to:

- Cascade the standards of this Code to their own suppliers and subcontractors.
- Conduct due diligence to identify, prevent, and mitigate risks related to human rights, modern slavery, and environmental impact.
- Disclose the identities and locations of sub-suppliers involved in the manufacturing or delivery of SurgEase products.
- Cooperate fully with SurgEase's due diligence and traceability efforts.

## **6. Conflict Minerals**

Suppliers must ensure that any tantalum, tin, tungsten, or gold used in goods supplied to SurgEase is sourced responsibly and does not contribute to armed conflict, human rights abuses, or modern slavery. Suppliers must maintain due diligence systems and provide evidence of responsible sourcing when requested.

## **7. Audit, Monitoring, and Compliance Verification**

Suppliers agree that SurgEase or its designated auditors may:

- Conduct announced, semi-announced, or unannounced audits of facilities, records, and worker interviews.
- Request documentary evidence of compliance with this Code.
- Require participation in corrective action plans where non-compliance is identified.
- Suspend or terminate business relationships in cases of serious or repeated breaches.

## **8. Grievance Mechanisms and Whistleblowing**

Suppliers must establish accessible and confidential grievance mechanisms for workers to report concerns without fear of retaliation. Any issues raised relating to this Code must be communicated to SurgEase immediately. SurgEase maintains a strict non-retaliation policy.

## **9. Training and Capacity Building**

Suppliers are encouraged to provide regular training to employees and management on ethical business practices, human rights, labour rights, environmental management, and compliance with this Code.

## **10. Remediation and Enforcement**

If a supplier breaches this Code, SurgEase may require immediate remediation, provide capacity-building support, or terminate the relationship. Serious breaches involving human

rights or modern slavery will result in immediate termination and may be reported to authorities.

## 11. Acknowledgement

By signing below, the Supplier confirms:

- Receipt, understanding, and acceptance of this Supplier Code of Conduct.
- Agreement to comply with all requirements outlined herein.
- Acknowledgement that compliance is a contractual obligation under the agreements listed in Section 1.

Signed for and on behalf of [INSERT NAME]:

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Signed for and on behalf of SurgEase Innovations Ltd:

Name: Fareed Iqbal

Position: CEO

Date: 14/08/2025

Signature:  \_\_\_\_\_