



## Corporate Anti- Slavery and Human Trafficking Policy

### A. INTRODUCTION

This Anti-Slavery and Human Trafficking Policy (the “Policy”) is a supplement to the guidelines described in the Employee Handbook and applies to the activities of all companies of the group (ACuPowder, ECKA Granules and SCM Metal Products, referred to collectively as the “Company”, or, “Kymera International”).

The Company is committed to a work environment that is free from human trafficking and slavery, which for purposes of this Policy, includes forced labor and unlawful child labor. The Company does not tolerate or condone human trafficking or slavery. This Policy is consistent with Kymera International’s Code of Ethics and its core values. All Company employees, contractors, subcontractors, vendors, suppliers, partners and others with whom the Company conducts business with, are expected to comply with this Policy.

The business principles and ethics of the Company are not to be compromised and employees’ business actions must abide with all laws and regulations, including those relating to anti-slavery, human trafficking and the Modern Slavery Act of 2015, whereby individuals are deprived of their freedom and are exploited for commercial or personal gain. Slavery and human trafficking is a crime.

The Company abides by all anti-slavery and human trafficking rules for the greater good of Kymera International and its employees. These general compliance guidelines are not meant to be fully encompassing, and any further clarification required should be directed to a Company manager or Human Resource department.

**While managers should monitor their employees’ behavior and conduct and ensure that employees fully understand the importance of this Policy, each employee is responsible for his/her actions and must ensure compliance with anti-slavery and human trafficking laws and with this Policy. Violations of this Policy may subject an employee to disciplinary action, up to and including termination of employment.**

### B. OVERVIEW

#### *Introduction*

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced or compulsory labor or human trafficking. The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships. Kymera International makes every effort to ensure that modern slavery and human trafficking does not occur at any of its manufacturing plants or business offices and as such expects the same high standards from all of its suppliers, contractors and other business partners. The Company accepts that it has a responsibility through its due diligence

processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications. This Policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, volunteers, agents, contractors, consultants and business partners.

### ***Policy***

The Company prohibits trafficking in persons, slavery or the exploitation of any person. The Company employees, contractors, subcontractors, vendors, suppliers, partners and others through whom the Company conducts business with, must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons;
- Procuring commercial sex acts;
- Using forced labor in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging applicants/candidates recruitment fees;
- Compensating employees, vendors or contractors with cash to achieve a reduced wage outcome or to avoid taxes.

The Company is committed to maintaining and improving its systems and processes and to eliminate human trafficking and slavery.

### **C. RECOGNIZING SIGNS OF SLAVERY OR HUMAN TRAFFICKING**

The points below are not complete, should not be taken as the only sign(s) that a person may be a victim of illegal activity, and are only meant to demonstrate some behavioral examples that may warrant further investigation.

- The person does not have their own identification.
- The person appears to have been coached or instructed by someone else.
- The person only allows others to speak for them when spoken to directly.
- The person regularly appears scared or nervous.



#### **D. RESPONSIBILITY**

The CEO has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations. Human Resources has day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. Human Resources are also responsible for investigating allegations of modern slavery in the Company's business or supply chains. Managers are responsible for ensuring that those reporting to them understand and comply with this Policy.

#### **E. COMPLIANCE**

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this Policy. If you believe or suspect a breach of or conflict with this Policy has occurred or may occur, you must notify your manager or report it to Human Resources. If you feel that the Company is in violation of this Policy and do not feel comfortable talking with a manager or Human Resources representative you may call an anonymous tip line at 1-800-461-9330 in the United States and +1-720-514-4400 outside the United States.

**ALL COMPLAINTS OR INCIDENTS OF POTENTIAL VIOLATIONS OF THIS POLICY MUST BE REPORTED PROMPTLY.** The Company cannot resolve a potential violation unless it knows about it. Every reported potential violation will be investigated thoroughly and in a timely manner.