



Code of Ethics and Business Conduct

Policy Owner: General Counsel

I. SCOPE

It is the policy of Kymera[®] International (hereinafter the “Company”) to conduct business with the highest standards of integrity and in accordance with all applicable laws. Employees are expected to deal fairly and honestly with each other as well as with our vendors, customers, and other third parties.

This Code of Ethics and Business Conduct (hereinafter the “Code”) is an important foundation for furthering the Company’s goal to grow while meeting the expectations of our stakeholders sustainably.

Our success is primarily based on the trust that our stakeholders – customers, employees, suppliers, and the countries and communities in which we live and work – have in the Company.

II. OUR VALUES

Taking personal responsibility for our actions is critical to the success of our Company. As employees, we are all responsible for how the Company conducts business and the impact the Company has around the world. We believe that we each have a role to play in protecting the Company’s reputation and that we should live our values and do what is right for each other, our customers, and the communities where we work around the globe, even when no one is watching.

Integrity is the foundation of the Company’s relationships with our stakeholders. It provides us with the opportunity to meet the needs of our customers better than our competitors. Our commitment to integrity means that we will exceed the minimum requirements of the applicable laws and industry practices. This Code guides our behavior as employees of the Company and identifies conduct that is not permitted during employment with the Company. In acting with integrity, our Company is committed to the following principles:

- Obeying the laws and regulations that govern our Company, wherever we operate;
- Treating all individuals with respect;
- Fostering a climate of transparency where we communicate in a direct, honest, and open manner;
- Taking initiative to address issues before they become problems; and



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- Using good judgement to avoid actions and circumstances that may appear to create a conflict between personal and Company business.

Violations of our principles will not be tolerated under any circumstances. In certain cases, these violations may lead to termination of employment or legal actions against an employee, and the Company could also be implicated in these legal actions.

III. OUR OBLIGATIONS

1. Any conduct that may raise questions as to the Company's integrity or character damages its reputation or creates the appearance of illegal, unethical, or improper conduct is prohibited.
2. Each Company employee is responsible for compliance with this Code.
3. Managers are responsible for communicating the requirements in this Code to all their direct reports.

IV. CONDUCT CONCERNING OUR CUSTOMERS, SUPPLIERS, AND COMPETITORS

A. Conflict of Interest

The Company and its employees shall conduct Company business affairs honestly, impartially, and ethically, avoiding conflict between personal interests and those of the Company, perceived or otherwise. Every employee is expected to avoid any situation in which their interests (or those of their family) may conflict with the interests of the Company.

A conflict of interest occurs when an employee engages in activities or relationships—such as investments, outside employment, romantic partnerships, or obligations—that could lead to a situation where they use their position and influence within the Company for personal gain or to benefit others, rather than prioritizing the best interests of the Company. This includes conflicts between family members, relatives, friends, and social or business acquaintances. *Please refer to Kymera's Corporate Anti-Bribery and Anti-Corruption Policy for more information related to Conflicts of Interest.*

As an example, Company employees are expected to use non-discriminatory practices throughout the supplier selection process. Every employee with a financial



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interest in any actual or potential supplier or customer must disclose that interest to their supervisor immediately.

B. Customer Satisfaction

The Company is dedicated to exceeding the expectations of our customers better than any of our competitors. We will provide our customers with products, information and support that yield a comparative advantage.

C. Company's Products

The Company's products are an extension of the Company itself. In all aspects of the design, manufacture, sale and support of our products, we will continuously strive for improved quality, innovation and safety. We are committed to making products that meet the performance and safety needs of our customers.

D. Anti-Bribery and Foreign Corrupt Practices Act

Conducting business without engaging in bribery or other corrupt practices is a fundamental component of our principles. The Company is subject to the requirements of the Foreign Corrupt Practices Act (the "FCPA").

Generally, the FCPA prohibits payments by companies and their representatives to foreign (non-U.S.) government and quasi-government officials to secure business.

It is the Company's policy to conduct business in compliance with the FCPA and with all applicable local, national, and international anti-bribery and anti-corruption laws. It is each employee's responsibility to understand what may constitute a violation, and to proactively seek assistance should he/she see a possible violation of this Code.

Suppliers, customers, potential suppliers, and potential customers are to be treated honestly and fairly. Gifts of cash or other forms of money are prohibited, except for Company-approved programs and promotions which are otherwise in compliance with this Code. *Please refer to Kymera's Anti-Bribery and Anti-Corruption Policy for more information.*

E. Relations with Government Employees

The rules and regulations governing the conduct of government employees generally



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prohibit contractors from providing gifts, gratuities, or anything of value to government employees.

Accordingly, it is the Company's policy that no entertainment, meals, gifts, gratuities, discounts, or other business courtesies may be offered or provided to any government employees except for non-alcoholic beverages (such as coffee or water) if normally provided as part of the interaction.

The Company follows all applicable laws and interacts honestly and fairly with government representatives as well as complying with valid governmental requests.

All employees must be truthful and straightforward in our dealings with the government and may not direct or encourage another partner or anyone else to provide false or misleading information to any government official or representative. *Please refer to the Company Corporate Anti-Bribery and Anti-Corruption Policy for more information.*

F. Illegal or Improper Payments and Anti-Money Laundering

Many laws govern the conduct of trade across borders, including laws that are designed to ensure that transactions are not being used for money laundering. Money laundering is a process that criminals, terrorists, and others use to move funds gained from illegal activity through legitimate businesses to make the funds appear legitimate.

The Company prohibits employees from offering, promising, making, authorizing or accepting payment or anything of value to or from anyone to obtain an improper business advantage. Bribes, kickbacks, or any form of such payment to any individual or person for the purpose of obtaining business or business concessions are strictly prohibited. Any person receiving a demand or any offer of bribe, kickback or any other form of payment or improper consideration must report the demand immediately.

Always know who is behind every transaction and only conduct business with reputable third parties engaged in legitimate business activities. Before establishing any business relationship, the Company and its officers or employees must check applicable information (including financial information) on potential business partners to verify that they are reputable and involved in a legitimate business. Employees must strictly follow Company payment procedures and report any irregular payments or requests. The Company shall always comply with all applicable

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laws and regulations related to illegal or improper payments and anti-money laundering. *Please refer to the Company Corporate Anti-Bribery and Anti-Corruption Policy for more information.*

G. Political Contributions

The Company will comply with all applicable laws and regulations regarding participation in political affairs, including contributions to individual candidates or political organizations. No employee shall make any political contribution or pledge of such contribution or other expenditure to any political organization or candidate for political office on behalf of Company, without the approval of the Legal and Compliance department, the General Counsel & Chief Compliance Officer or the Compliance Manager. Employees may make personal political contributions to any organization, candidates for political office so long as the employee does not represent that such contribution is from the Company or suggest in any way that the employee’s personal views are the views of the Company. Any personal political contribution shall be the sole personal responsibility of the employee, and the Company shall not assume or accept any responsibility for such contributions.

No employee shall make any personal political contribution with the purpose of assisting the Company to obtain or retain business or with the purpose of influencing any decision of any government official or agency for the Company’s benefit without the approval of the Kymera Legal and Compliance department, the General Counsel & Chief Compliance Officer or the Compliance Manager.

V. FAIR COMPETITION AND ANTI-TRUST

Fair competition/anti-trust laws regulate the Company’s relationship with its vendors, customers, and competitors. These laws cover agreements among competitors, agreements with resellers, price discrimination, and other acts that may unfairly reduce competition.

The underlying principle behind these laws is that a person who purchases goods in the marketplace should be able to select from a variety of products at competitive prices unrestricted by artificial restraints, such as price fixing, illegal monopolies and cartels, boycotts and tie-ins. We gain our competitive advantages through hard work and by exceeding our customers’ expectations, rather than through unethical or illegal business practices. Even the appearance of improper agreements with competitors can harm our reputation and risk legal action.

The following activities are examples of “red flags” to be avoided and reported to your immediate supervisor:



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- Agreements with competitors, including price fixing, bid rigging, allocating markets or territories, and agreements to restrict supply.
- Exchanging competitively sensitive information with competitors.
- Imposing restrictions on vendors.
- “No-poach agreements” or agreements between competitors not to hire or pursue each other's employees; Abusing a position of market dominance (generally a market share of over 50%) by engaging in anti-competitive activity.

Therefore, employees must always adhere to the following rules:

- Commercial policy and prices will be set independently and will never be agreed, formally or informally, with competitors or other non-related parties.
- Customers, territory, or product markets will never be allocated between the Company and its competitors but will always be the result of fair competition; and
- Customers and suppliers will be dealt with fairly.

All Company employees who are in regular contact with competitors have a responsibility to ensure that they are familiar with the applicable competition laws.

Penalties for violations are severe. Employees may not enter into agreements, arrangements, or otherwise engage in any activity with vendors, customers, and/or competitors, which may lessen or restrain competition in violation of applicable law.

In addition, employees should be extremely sensitive about any contact with a competitor, or its employees absent for a valid, lawful purpose. *Please refer to our Corporate Anti-trust Policy for more specific information.*

VI. Equal Employment Opportunity / Workplace Environment

The Company provides equal employment opportunities to all employees and applicants for employment without regard to race, religion, color, national origin, age, sex, pregnancy, gender identity, transgender status, and sexual orientation, disability, genetic information, marital status, veteran status, or any other protected class characteristics in accordance with applicable laws and regulations of the countries and regions in which it operates.

The Company complies with applicable laws governing nondiscrimination in employment in every location in which the Company has facilities.



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This Code applies to all terms and conditions of employment, including hiring, placement, promotion, termination, transfer, leaves of absence, compensation, and training.

In addition, the Company is committed to providing its employees with a workplace that is free from discrimination and harassment, and from retaliation for reporting illegal discrimination or harassment, and from personal behavior not conducive to a productive work environment.

The Company considers respect for others of utmost importance. Each employee will treat every other employee, customer, vendor, and others met in the course of work with dignity and respect. Harassment and bullying of any type in the workplace will not be tolerated.

VII. WORK RULES, PROGRESSIVE DISCIPLINE, CORRECTIVE ACTION

Under normal circumstances, supervisors are expected to follow the procedure outlined below. There may be particular situations, however, in which the seriousness of the offense justifies expediting one or more of the steps in the procedure.

Discipline Procedure

- a. Verbal Warning
- b. Written Warning
- c. Final Written Warning / Suspension
- d. Termination

The disciplinary procedure typically includes corrective actions and a notification of the supervisor's views before any further action is taken. However, each situation will be assessed individually, and serious offenses may lead to immediate termination. A written statement outlining the disciplinary action or termination will be added to the employee's personnel file. *Refer to the Company Corporate Employee Handbook for more information.*

VIII. INFORMATION TECHNOLOGY

A. General

Computers, systems, and networks are an integral part of the Company's business. The Company has made substantial investments in human and financial resources to create and maintain these systems. To protect that investment, policies have been established to safeguard the information contained within these systems and reduce the company's business and legal risks.

Employees should not undermine or ignore security devices and/or procedures, including proper use of passwords, firewalls, virus protection software, and other



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devices or procedures that may be installed or instituted. Unauthorized viewing or transferring of confidential or proprietary material to the Company is strictly prohibited. Inappropriate or illegal use of any Company communications systems is also prohibited.

B. Right to Monitor

All Company-provided technology and Company-related work documents and records are the property of the Company. The use of Company computer equipment, systems, or services implies consent to monitoring activities. Any information stored on a Company system is Company property, even if the employee considers the information to be personal or private.

Therefore, the Information Technology (“IT”) Department is authorized to access, disclose, or delete personal information as needed without prior notice. Employees should not expect any level of privacy when using Company computer equipment or systems. All electronic communications from a Company system, including text and images, may be disclosed to law enforcement or other third parties without the prior consent of the sender or the receiver.

C. Copyright and License Agreements

It is the policy of the Company to comply with all laws regarding intellectual property and copyrights. The Company is legally bound to comply with Federal Copyright Act (Title 17 of the U.S. Code) and all proprietary software license agreements. Employees may not download or install any software without the express approval of IT staff. *Please refer to the Company Corporate Data Protection Policy for more information.*

D. Access Codes and Passwords

The confidentiality and integrity of data stored on Company computer systems must be protected by access controls to ensure that only authorized employees have access. This access shall be restricted to only those capabilities that are appropriate to each employee’s job duties.

The IT department shall administer access controls to all the Company's computer systems. Employees shall not disclose passwords to other employees or management. If a password is compromised, employees should change it immediately or notify the IT department for assistance in changing it. Employees shall be responsible for all computer transactions made with their system credentials and passwords. Employees should follow all password guidelines as directed by the IT department. Access to any computer system with login credentials other than the employee’s own is strictly prohibited without the express



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written permission of their supervisor or the Chief Information Officer (“CIO”) of IT.

E. Company-Provided Computers, Laptops and Portable Electronic Devices

Employees are expected to protect any Company-supplied computers, laptops, or portable electronic devices from loss, damage, or theft. Upon request, an employee may be asked to produce the devices for return or inspection at any time. Employees are required to report any lost or damaged computer, laptop, or mobile device immediately to the Company IT department.

Damages deemed abusive or excessive or the loss of equipment determined to be due to negligence on the part of an employee may result in either reimbursement to the Company for the cost of replacement, corrective or disciplinary action up to and including termination or both.

The use of personal peripherals with a Company computer is not allowed without the express permission of the Company IT department. All electronic hardware purchased by the Company should be returned when no longer needed or at termination of employment.

F. Remote Access

Employees who remotely access the Company's computer and information systems must follow all IT guidelines and protocols to maintain both remote access privileges and the integrity of the Company's systems. *Please refer to the Company Corporate Remote Work Policy for more information.*

Employees who use their personal devices to access Company systems should expect to follow the same IT guidelines and protocols as if they were Company-issued devices. *Please refer to the xxx policy*

G. Internet / Voicemail / E-Mail / Messaging

Improper use of electronic systems, e-mail, texts or the Internet, including sites or materials which use profanity, vulgarity and off-color language and the receipt, distribution or duplication of any document or message containing such material considered offensive or harassing is a violation of Company policy. Voicemail and e-mail messages or computer downloads containing foul, offensive language, sexual content, racial, ethnic, religious or other discriminatory slurs are prohibited.

Employees may not use their Company-issued computer or other electronic communication systems to attempt to convert or solicit others toward religious,

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charitable, commercial or political positions or on behalf of any outside organization that are not sponsored by the Company or approved by the Company’s Human Resources department in advance.

Please refer to the Company Corporate Email Policy and Company Corporate Instant Messaging Policy for more information.

H. Personal Use of Company Electronic Property, Systems and Networks

Computers, laptops, tablets, and other mobile computing devices provided by the Company are to be used primarily for business purposes. Excessive personal use of Company-provided computers, laptops, and mobile devices is discouraged. Further, non-work-related activities including but not limited to chat rooms, social media, games, music, gambling or any illegal activity are strictly prohibited. *Please refer to the Company Corporate Media and Social Media Policy for more information.*

I. Personal Mobile Phones

Many employees carry personal mobile phones/smartphones with them at work. Generally, personal use of these devices, including frequent or lengthy phone calls, texting, emailing, social networking, blogging, gaming, or browsing the Web, should be limited to breaks and lunch times. Further, to ensure employee privacy and protect business information/trade secrets, the Company prohibits employees from taking any pictures in the workplace with a personal mobile phone camera unless otherwise authorized for purposes of recording work-related incidents.

Production environments pose a specific hazard, as well as productivity concerns, if employees are distracted by their personal mobile phones. Therefore, to ensure the safety of our employees and visitors, the following provisions specifically apply to all direct labor manufacturing employees:

- a. All electronic devices must be completely turned off or silenced (vibration mode is not acceptable) during work time.
- b. Only during breaks and lunches may personal phones be used in the workday to: (a) make or receive calls (b) check for phone messages (c) send or read text messages (d) read or respond to e-mail (e) surf the internet.

If an employee’s use of a personal mobile phone device causes disruptions or loss in productivity, the employee may become subject to corrective action. Employees

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should discuss with their supervisor in advance any situation (such as urgent need) that may require a temporary exception to this Code.

The Company will not be liable for damage or loss of personal mobile phones brought into the workplace.

IX. ENVIRONMENT

It is the policy of the Company to manage and operate its business in ways that are protective of the environment and that conserve both energy and natural resources. As a global organization, the Company understands the importance of promoting sustainable practices in all areas of its business.

The Company recognizes its role in minimizing impact on the local environment in which it operates. The Company is committed to conducting its operations in a socially and environmentally responsible manner and compliance with applicable laws, rules and regulations is the foundation of the Company's operational standards. *Please refer to the Company Corporate Environmental Protection Policy for more information.*

X. SLAVERY, HUMAN TRAFFICKING, AND CHILD LABOR

We respect human rights and the dignity of people throughout our operations and global supply chain. We comply and expect our contractors, subcontractors, vendors, suppliers, partners, and others with whom the Company conducts business to comply with laws that promote safe working conditions and individual security, laws prohibiting forced labor, prohibitions on the employment of underage children, prohibitions on human trafficking, and laws that ensure freedom of association and the right to engage in collective bargaining. *Please refer to the Company Corporate Anti-Slavery Policy and Company Corporate Human Rights Policy for more information.*

XI. ECONOMIC SANCTIONS, IMPORT AND EXPORT LAWS, AND ANTI-BOYCOTT LAWS

The Company participates in international commerce, and all its subsidiary offices and affiliates are subject to U.S. laws governing international trade.

Export controls and trade sanction laws impose restrictions regarding the sale, shipment, electronic transfer, provision, or disclosure of information, software, goods, assets, funds, and services across national borders or involving parties subject to economic sanctions. Exports also include electronic transfer, through discussions or visual inspections, and not only through traditional shipping methods.

- a. Shipments to certain entities (i.e. individuals, organizations, groups, companies) may require an export license, or may be

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prohibited. *Please refer to the Corporate Screening Compliance Policy.*

- b. Export control laws may prohibit the export of information about sensitive equipment, goods, software and technology, including imposing export license requirements prior to release or export. This includes transfer to the Company subsidiary and/or affiliate in another country.
- c. Embargoed laws prohibit companies from conducting business with individuals and companies in designated countries. *Please refer to the Company Corporate Sanctions Policy.*
- d. As a U.S. owned company, all subsidiary offices and affiliates, regardless of location, must comply with U.S. import/export control laws including local regulatory requirements.
- e. Employees involved with the sale or shipment of products across international borders are expected to understand and comply with the import/export control requirements of all countries in which we conduct business.

Failure to comply with these laws can seriously impact on our business and reputation, lead to significant fines, and can even result in the loss of our export privileges.

XII. INTELLECTUAL PROPERTY / CONFIDENTIAL AND PROPRIETARY INFORMATION

All patent rights, ideas, and designs related to the business of the Company originated or developed during the period of employment, either alone or working with others, shall be assigned to the Company and the sole property of the Company.

Intellectual property and confidential and proprietary information include, without limitation concepts, inventions or ideas developed by Company employees related to Company's business, whether or not patented including manufacturing know-how, financial information, marketing reports and strategy, policy manuals, computer data and software, drawings, customer, vendor and employee files, price and profit data, forecast and business plans, pending acquisitions or development plans.

No employee shall make any unauthorized use or disclosure of any of the Company's intellectual



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property or other confidential and proprietary information, or the confidential information provided to the Company by our business partners.

The company prides itself on providing a high standard of care for our employees, contractors, subcontractors, vendors, suppliers, partners, and others with whom the Company conducts business. We ensure that the personal data that the Company collects is securely protected in compliance with GDPR and other applicable data protection laws to safeguard all. Please refer to our Privacy Statement for more specific information.

XIII. ACCURATE RECORD-KEEPING

Business and financial records are essential to our business operations. We rely on the integrity and accuracy of those records. This matters for both internal decision-making and the benefit of investors, government agencies, regulators and others to whom we report.

Accurate and transparent record-keeping protects our reputation, promotes organizational efficiency, and helps us meet our legal and regulatory obligations. Our records are not limited to financial transactions, but also relate to matters including production reports, emission records, safety reports and other records that meet our legal obligations. Employees with a role in financial or operational accounting, tax or reporting have a special responsibility in this area, but all of us contribute to the process of recording business results and maintaining records.

A. Product Quality and Safety

The Company is committed to providing safe, quality products. We will use only those processes, standards, systems and suppliers that foster the safety, quality, authenticity and regulatory compliance of our products and services. We will communicate relevant product safety and quality matters both internally and externally. We will adhere to those requirements we have mutually agreed to with our customers.

All employees have a responsibility to ensure the production of safe, quality products that comply with the applicable laws and regulations and meet certification and Company requirements.

All required inspections and testing operations must be properly completed. The Company has processes and procedures to help ensure that it receives responsibly sourced materials from its suppliers, including requiring applicable suppliers to provide sources of origin information on Conflict Minerals contained in their products. *Please refer to the Responsible Sourcing Policy and Conflict Minerals Policy for more information.*

B. Safe, secure & healthy workplace



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Our goals are ZERO accidents and Safety and Health protection for all our employees. We are systematically implementing advanced EHS prevention programs and procedures. No matter the plant location, all our people are protected following the same Company standards.

We must ensure a healthy and safe work environment for all persons working in our facilities worldwide, regardless of the workers' connection to our company. Hence our EHS system shall embrace health and safety for all; employees, temporary workers, permanent and non-permanent contractors and visitors, giving everyone the same protection. We all have the same requirements no matter what the location of the entity.

We adhere to all applicable health and safety laws and regulations, as well as internal rules and policies, to help ensure workplace safety. We take our commitment to ensuring a safe and healthy workplace seriously and believe it's everyone's responsibility.

Employees are responsible for following all procedures, working safely, and, wherever possible, improving safety measures. An injury and accident-free workplace is our goal. Through continuous safety and loss control, we can accomplish this. *Please refer to the Company Environmental, Health & Safety Policy for more information.*

C. Speaking up

If you see or suspect any illegal or unethical behavior, it may be tempting to ignore it or hope someone else will take action. However, misconduct impacts all of us. If something seems off, each of us should feel empowered to respond. Speak up! When you raise a concern or report questionable behavior, you are protecting yourself, your colleagues, and the company's reputation. It's important to remember that issues cannot be addressed unless they are brought to someone's attention.

If you are concerned about a possible violation of this Code, company policy or the law, in most cases, your manager should be your first point of contact. They are likely in the best position to understand your concern and take appropriate action. *Please refer to the Compliance Helpline Policy for more information.*

D. Open-Door

Employees may and should ask questions about issues that are not clear to them. The Company's Open-Door practice provides you with access to two-way, honest, and respectful communications. This practice is intended to create an atmosphere that encourages you to voice your concerns, discuss problems, ask questions, and offer suggestions about workplace conduct issues. Refer to section IX. *Reporting* of this policy for employee reporting options.



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You should feel comfortable approaching your immediate supervisor, any other supervisor/manager, human resources associate, corporate officer, or any other Company resource at any time.

E. Acknowledgement

All new employees and annually thereafter shall acknowledge that they have received and read the Code of Ethics and Business Conduct and will abide by the letter and spirit of its terms. Further, the failure to abide by this Code may lead to disciplinary action, up to and including termination of employment, as well as any appropriate legal action.

IX. REPORTING

Any suspected violations of any applicable local or foreign laws, regulations, customs, or social standards must be immediately reported to the Kymera Legal and Compliance Department or the Human Resources Department. If there is any uncertainty, then the employee will be responsible for seeking guidance from the Kymera Legal and Compliance department, which can be contacted via email at: legalandcompliance@kymerainternational.com

If you are concerned about the nature of a gift or gratuity offered or requested, if you believe you are being discriminated against, harassed, or retaliated against, employees should report to the Compliance Helpline immediately. Reporting anonymously can be done through the Compliance Helpline. www.convercent.com/report