	Doc. No.: KI 108 EN 03
	Version/Type: 02/Compliance Supersedes: KI 108 EN 01
Corporate Anti-Slavery and Human Trafficking Policy	Issue Date: 16 June 2025
	Policy Owner: Global Compliance Manager

I. SCOPE

It is the policy of Kymera® International, its subsidiaries and its affiliates (herein after collectively the “Company” or “Kymera”), its directors, officers, and employees, as well as all consultants, representatives, agents, brokers, suppliers and other intermediaries when they are acting on behalf of the Company (herein after collectively “Company Representatives”) to conduct business with the highest standards of integrity and in accordance with all applicable laws. This Corporate Anti-Slavery and Human Trafficking Policy (hereinafter the “Policy”) is intended to supplement the Company’s Code of Ethics and Business Conduct Policy and applies to all Company Representatives.

II. INTRODUCTION


The Company is committed to combating the risk of modern slavery and human trafficking in its business and supply chain. Its approach to human rights, including modern slavery and human trafficking, forms part of Kymera’s commitment to ensure that all aspects of its business is built on a strong foundation of fairness, ethical behavior, and integrity.

This Policy sets forth the principles and expectations for all Company Representatives providing goods and services to Kymera.

The Company's Corporate Code of Ethics and Business Conduct Policy, Human Rights Policy, and Supplier Code of Conduct Policy collectively address a wide range of human and workplace rights within the Company's global operations and supply chain. These policies are designed to ensure fairness, ethical behavior, dignity, and respect for all individuals. The Company regularly reviews and updates these policies to ensure they remain current and relevant.

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, including slavery, servitude, forced or compulsory labor, and human trafficking. Kymera maintains a zero-tolerance policy toward modern slavery and is dedicated to conducting all business dealings and relationships with ethics, integrity, and transparency. We strive to ensure that modern slavery and human trafficking do not occur in any of our manufacturing plants or business offices. We expect the same high standards from all our suppliers, contractors, and business partners. The Company takes seriously its responsibility to prevent the exploitation of workers, ensure their safety, and comply with relevant employment, health and safety, and human rights laws and standards, including the right to freedom of movement. This Policy applies to all individuals working for or on behalf of the company in any capacity, including employees, directors, officers, volunteers, agents, contractors, consultants, and business partners.

The Company strictly prohibits the use of child labor in any form. Child Labor is defined herein as the employment or engagement of individuals under the age of 18, or under the legal minimum working age as defined by the applicable national or international standards, whichever is higher.

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The Company is committed to complying with all relevant laws and regulations regarding child labor. The Company provides fair and equitable working conditions, including reasonable working hours, rest breaks, and fair compensation in accordance with applicable laws and regulations. The Company ensures that employees have access to suitable facilities, including clean and sanitary restrooms, adequate lighting, and ventilation. We promote a work environment that respects privacy, fosters open communication, and encourages collaboration among employees.

The Company encourages open communication channels between management and employees, promoting dialogue, feedback, and consultation to address concerns, promote cooperation, and improve working conditions. See the Compliance Helpline Policy for more information on providing feedback to the Company.

At Kymera, we embrace diversity and inclusion in our workforce, treating all Company Representatives with fairness, respect, and dignity, regardless of race, color, gender, sexual orientation, religion, disability, or any other protected characteristic under applicable law. See the Code of Ethics and Business Conduct Policy and the Employee Handbook for more information.

Kymera recognizes and respects the human rights of external stakeholders, including customers, suppliers, and the communities in which we operate. The Company conducts business activities in a manner that respects human rights, adhering to international standards and local laws. The Company strives to engage in fair business practices, including responsible sourcing and supply chain management, to ensure our external stakeholders' rights are upheld.


III. PROCESS

To ensure compliance with the prohibition of child labor, the Company will establish appropriate measures for age verification during the hiring process, to the extent allowed by and consistent with applicable law.

MEASURES TAKEN TO IDENTIFY AND ADDRESS MODERN SLAVERY AND HUMAN TRAFFICKING RISK

Kymera conducts periodic human rights impact assessments to better understand the Company's potential modern slavery and human rights impacts and opportunity areas for continuous improvement. Kymera's impact assessment includes the following areas where potential modern slavery risk may exist:

- i. **Company Operations:** Modern slavery risk may exist within the contingent labor population, particularly at lower levels of the upstream supply chain, in high-risk countries and in sectors where low-skilled labor is more common. The Company's contingent workers, including contract service workers, subcontractors, and independent contractors, can only be retained through a vendor arrangement.

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The Company manages strong partnerships with these enterprise vendors, who are subject to pre-qualification and contractual obligations to ensure compliance with applicable labor standards.

- ii. **Supply Chain:** Given the Company’s international footprint and the diversity of its products and services, modern slavery risks may potentially exist in the Company’s supply chain. To address the potential risk, Kymera has established standardized policies and processes to assess, monitor, and audit suppliers against our Supplier Code of Business Conduct Policy through a standardized supply chain due diligence program that includes the following elements:

- **Screening of New Suppliers:** The Company has an ongoing policy of screening and vetting new suppliers. As part of the screening process, the Company considers reliable third-party sources that identify various compliance risks, including labor and human rights violations, fraud and illegal activities. Identified risks are reviewed and vetted by a subject matter expert.
- **Supplier Monitoring:** the Company applies the same screening and review process to conduct a real-time continuous monitoring diligence program that applies to all existing suppliers.
- **Supplier On-Site Social Responsibility Audits:** The Company has a risk-based program in place to conduct on-site audits of its higher-risk suppliers to ensure compliance with the Supplier Code of Business Conduct, including Company policies regarding Human Rights.
- **Corrective Action and Remediation:** the Company implements corrective action plans to remediate risks or findings identified through Supplier Screening, Monitoring or Audits programs, up to and including suspension or termination of the supplier relationship.

iii. **Key questions to ask Suppliers**

To effectively combat modern slavery in the Company’s supply chain, it is crucial to thoroughly understand the entire supply chain and the origins of products and services. Modern slavery can take many forms, making it important to identify warning signs that may indicate potential issues. Establishing visibility within the supply chain allows the Company to monitor and assess risks, ensuring appropriate action can be taken to address any concerns. By remaining vigilant and proactive, the Company can uphold its commitment to ethical practices and protect the rights of those impacted within the supply chain. Company Representatives must be aware of which countries and regions are at greater risk of slavery in the workforce. Many of these countries are in volatile regions, which have experienced political instability, conflict, and/or authoritarianism.

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Migrant workers comprise the vast majority of the workforce in Saudi Arabia, the United Arab Emirates, and Kuwait where they effectively fall under the control of employers due to the kafala (sponsorship) system and have few, if any, labor rights.


- **How have you mapped your supply chain?** This question reveals whether a company will likely focus on combatting modern slavery. A good indicator is if a supplier has mapped out its supply chain for key products and services. This is also critical to confirm raw materials are not sourced from embargoed and/or sanctioned countries.
- **What does your supply chain look like?** It is important to understand where your suppliers' products and services are sourced from and what workers' rights are like within these countries.
- **What is your response to modern slavery risks?** This is a key question for obvious reasons. It is important to get insight into whether the supplier has modern slavery and/or human trafficking policies, for example, if there are consequences for non-compliance and whether employees receive modern slavery training.
- **How would you describe the working conditions of your workers?** This question delves into whether the supplier's employees are treated fairly regarding compensation, the right to join a trade union, the safety of the working conditions etc. This insight will give you an understanding of the existing employment relationship and should uncover any suspicious dynamics.

IV. RECOGNIZING SIGNS OF SLAVERY OR HUMAN TRAFFICKING


Below is a list of signs of possible slavery or human trafficking. These signs can be subtle and may not always be obvious. The Company and its Company Representatives must take proactive steps to identify and address potential risks, including conducting due diligence on suppliers and educating employees on recognizing the signs of modern slavery.

Modern Slavery signs in Supply Chain:

- Physical and psychological abuse.** Many victims will look malnourished and may appear withdrawn when you try to communicate with them. Signs of physical abuse could be apparent, such as bruising and other injuries.
- Restricted movement.** Victims may not be allowed to travel alone and will not have possession of their passports. They may seem, under the influence of others, have little interaction, and be unfamiliar with the surroundings in which they are working.

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- iii. **Poor accommodation.** A victim of modern slavery will likely have an extremely poor standard of living, often staying on-site in cramped and dirty conditions with other workers. It is also possible that they would not know their home or work address.
- iv. **Lack of personal belongings.** As well as having no form of identification, such as a passport, a victim of modern slavery will likely have very few personal possessions and wear the same clothes every day. These clothes could appear unsuitable for their working conditions.
- v. **Unusual behavior.** It is quite common for victims of modern slavery to avoid eye contact, continually appear frightened, and allow others to speak for them when addressed directly. They will be very reluctant to ask for help, possibly due to fear of further abuse or deportation.
- vi. **Working conditions**
 - Excessively Long Hours: Workers are forced to work long hours, back-to-back shifts, with no days off.
 - Lack of Contract/Misleading Information: No formal contract or misleading information regarding contract details.
 - Underpayment or Wage Deduction: Underpayment of wages or unnecessary wage deductions.
 - Excessive Recruitment Fees: Workers are charged excessive fees for recruitment or health checks.
 - Unsafe Working Conditions: Workers may lack basic training, safety gear, or work in unregulated or unsafe environments.
- vii. **Key Requirements**
 - Employees responsible for sourcing materials are responsible to **carry out unannounced spot checks and audits on suppliers** - adopt a risk-based approach, so more checks are carried out on suppliers or parts of the business that pose the most risk.
 - **Don't impose unreasonable demands on suppliers** - excessive production targets or squeezed margins make it more tempting for suppliers to cut corners or tolerate child labor.

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- **Commit to fair and sustainable trade** - it's not just about profitability. Remember, we have social and environmental obligations too. It's possible to be both profitable and principled.
- **Appoint local champions** - both within supply chains and with external stakeholders and NGOs, who may have expert knowledge of the local climate, identify risks and highlight worker exploitation.
- Verify countries where suppliers' source their raw materials. Sourcing from embargoed, sanctioned and/or high-risk countries (i.e. Uyghur region, China).

Suppliers who do not sign the Company Supplier Code of Conduct may be prohibited conduct of business.

V. RESPONSIBILITY

The Company requires its Company Representatives to follow this Policy as well as all Company policies, including but not excluding the Code of Ethics and its Human Rights Policy. All Company Representatives are encouraged to report any suspected cases of child labor, slave labor, forced labor, or human trafficking promptly via the Compliance Helpline at www.convercent.com/report or by email to the Legal & Compliance Department at legalandcompliance@kymerainternational.com.


The Company will actively promote awareness and understanding of the hazards and negative impacts associated with child labor, slave labor, forced labor, or human trafficking. Kymera will provide training and educational programs to our employees, supervisors, and managers to ensure they are knowledgeable about our policy, legal requirements, and the importance of preventing child labor, slave labor, forced labor, or human trafficking.

Employees are required to complete periodic training on Company policies, including the Code of Ethics Policy and Business Conduct training which occurs on an annual basis.

All applicable employees are required to undergo specific training on Human Trafficking Prevention. This training, which is also available to all employees, includes guidance on managing supplier on-site Social Responsibility Audits and how to address any findings. The training covers how to identify red flags related to human trafficking and forced labor, emphasizes the importance of conducting human rights due diligence before partnering with suppliers, and ensures that Kymera does not inadvertently support human trafficking. Additionally, it teaches employees how to report any violations of company policies.

VI. AUDITS

The Company is committed to continuously improving its labor and human rights practices. It will regularly review and update this Policy to align with evolving legal requirements, industry standards, and best practices.

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The Company will also engage with relevant stakeholders, including employees and external experts, to enhance its understanding and ensure the effectiveness of its policies.

i. Modern Slavery Statement

- The Company must use Kymera Terms and Conditions within their purchase orders to suppliers, which includes the Companies Modern Slavery statement.
- Suppliers must sign the Kymera Supplier Code of Conduct Policy which prohibits slave labor and human trafficking.
- Employees must sign the Company Corporate Code of Ethics and Business Conduct Policy which includes the Company's responsibility to avoiding modern slavery and upholding human rights.

i. Conduct Supplier Due Diligence

- Employees responsible for sourcing materials from suppliers are responsible for conducting supplier assessments on those what fall into high-risk categories.
- Enquire into their operations, how they source labor and materials.
- Mapping out the supply chain

ii. Conduct human rights due diligence


Perform human rights due diligence on your business and your global supply chain to better understand potential areas of exposure or key risks in your operations.

iii. Review workplace modern slavery policies

The Company will review current policies routinely to ensure they are kept up to date and reflect any changes to regulatory requirements and procedures.

iv. Training

Audits will be conducted of employee training related to this Policy, as well as other Company policies including but not limited to the Corporate Code of Ethics, and Human Rights.

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Failure to comply with this Policy, including the prohibition of child labor, may result in disciplinary action, up to and including termination of employment or contractual relationships. The Company is committed to cooperating with relevant authorities to ensure the enforcement of labor and human rights laws.

Adherence to this Policy is the responsibility of all Company Representatives. This Policy will be communicated to all applicable employees and will be made readily accessible to Company Representatives and external stakeholders. By promoting a culture of respect, dignity, and fairness, the Company aims to contribute to the well-being of its employees and the communities in which it operates.

VII. REPORTING

Kymera has a responsibility to provide annual reports, as applicable, to government agencies related to Modern Slavery and Human Rights. These reports are submitted by the Company's Legal and Compliance department, as applicable identifying the due diligence processes that are being taken to comply with regulatory laws.

- i. The Norwegian Transparency Act, also known as "Åpenhetsloven," is a law aimed at promoting human rights and decent working conditions by requiring companies to conduct due diligence and disclose information about how they address adverse impacts within their operations and supply chains. It applies to larger companies operating in Norway, including foreign companies selling goods or services in the country. The law mandates annual reporting on due diligence efforts and also requires companies to respond to public requests regarding how they handle human rights issues.
- ii. The Canadian Modern Slavery Act ("MSA"), formally known as the Fighting Against Forced Labor and Child Labor in Supply Chains Act, requires certain businesses to report on measures taken to prevent forced and child labor in their supply chains.
- iii. Compliance Helpline. If you have knowledge of, or reasonably good-faith grounds to suspect, wrongdoing related to the Company, its employees or agents, including a breach of the Company's Code of Ethics and Business Conduct, Company policies or legal or regulatory obligations, we encourage you to speak up. You should feel comfortable about voicing your concerns so that the Company can investigate. In some cases, individuals who raise such concerns are referred to as "whistleblowers" and the Company is committed to protecting such individuals. Company Representatives may report concerns to:
 - The Company's Executive Leadership Team
 - A member of the Company's Human Resources department
 - The Kymera's Legal and Compliance department via email to legalandcompliance@kymerainternational.com

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- The Company's anonymous Compliance Helpline www.convercent.com/report

Every report or concern will be addressed promptly and thoroughly by the Kymera Legal and Compliance Department. We are committed to transparency and accountability, which is why we will implement a comprehensive case management tool to efficiently track all incoming reports. Each case will be assigned to a qualified investigator, who may include experts from the Finance Department, Human Resources Department, members of the Legal and Compliance Department, and/or outside legal counsel to work on the case. Your trust is important to us, and we take every concern seriously.