

CORPORATE SOCIAL RESPONSIBILITY POLICY**TABLE OF CONTENTS**

Topic	Clause(s)
Scope and Purpose	Clause 1.1 – 1.2
Definitions	Clause 2.1 – 2.3
Ethical Sourcing and Production	Clause 3.1 – 3.3
Supplier Relationships and Fair Labor	Clause 4.1 – 4.4
Transparency and Accountability	Clause 5.1 – 5.2
Accessibility and Inclusion	Clause 6.1 – 6.3
Community Involvement and Philanthropy	Clause 7.1 – 7.4
Sustainability and Environmental Stewardship	Clause 8.1 – 8.5
Eco-Friendly Design and End-of-Life Management	Clause 9.1 – 9.3
CSR Reporting and Auditing	Clause 10.1 – 10.3
Wheelchair User Engagement	Clause 11.1 – 11.2
CGM-Specific Commitments	Clause 12.1 – 12.4
Stakeholder Engagement and Compliance	Clause 13.1 – 13.3
Digital Responsibility and Cyber Ethics	Clause 14.1 – 14.3
Diversity, Equity, and Inclusion (DEI)	Clause 15.1 – 15.3
Responsible Marketing and Customer Integrity	Clause 16.1 – 16.3

Clause 1: Scope and Purpose

1.1 This Corporate Social Responsibility (CSR) Policy outlines the principles, commitments, and governance mechanisms by which **Urathon Ltd** (“the Company”) integrates social value, environmental responsibility, and ethical business conduct into its strategy, operations, and stakeholder relationships.

1.2 The Policy reflects the Company’s corporate purpose: to improve lives through inclusive medical innovation, responsible entrepreneurship, and long-term value creation for society. CSR is not treated as an ancillary activity but embedded into the Company’s core decision-making under Section 172 of the **Companies Act 2006**, requiring regard for community, environmental, and stakeholder impacts.

Clause 2: Definitions

2.1 **Corporate Social Responsibility (CSR)** refers to the ethical and strategic approach by which the Company voluntarily integrates social, environmental, and governance concerns into its business operations and interactions with stakeholders.

2.2 **Stakeholders** include any individual, group, or organisation that may be affected by, or have an interest in, the Company’s activities, including customers, employees, suppliers, regulators, communities, and the environment.

2.3 **Sustainability** refers to the responsible management of resources and societal impact to meet current needs without compromising future generations, in accordance with the **United Nations Sustainable Development Goals (UN SDGs)**.

Clause 3: Ethical Sourcing and Production

3.1 The Company shall conduct all sourcing activities in accordance with ethical trade principles, requiring full compliance with the **Modern Slavery Act 2015**, **ILO Core Conventions**, and due diligence under the **OECD Due Diligence Guidance for Responsible Business Conduct**.

3.2 Suppliers must demonstrate adherence to labour laws, avoid modern slavery and child labour, and ensure traceability of critical materials, particularly in the manufacture of healthcare and mobility products.

3.3 The Company's Supplier Code of Conduct, legally binding via contract, sets enforceable standards for environmental protection, non-discrimination, humane working conditions, and anti-bribery.

Clause 4: Supplier Relationships and Fair Labour

4.1 All suppliers and contractors must comply with applicable UK labour law, including the **Employment Rights Act 1996**, **Equality Act 2010**, and the **National Minimum Wage Act 1998**.

4.2 The Company shall conduct routine human rights due diligence, requiring transparency and audit cooperation as a condition of continued engagement.

4.3 Employment practices must ensure fair pay, safe working environments, and freedom of association in line with international standards and UK obligations.

4.4 The Company reserves the right to terminate any commercial relationship in response to material breaches of human rights, environmental regulations, or ethical standards.

Clause 5: Transparency and Accountability

5.1 The Company will report on its CSR performance through its annual ESG or Sustainability Report, which will include legally required disclosures under the **Companies (Miscellaneous Reporting) Regulations 2018**.

5.2 Employees and stakeholders are protected by a formal Whistleblowing Policy compliant with the **Public Interest Disclosure Act 1998**, allowing confidential reporting of misconduct without fear of retaliation.

5.3 Key performance indicators (KPIs) shall be reviewed by the Board and published in line with **Global Reporting Initiative (GRI)** frameworks.

Clause 6: Accessibility and Inclusion

6.1 The Company is committed to being an inclusive, disability-confident employer and service provider. All premises, products, and communications shall be accessible under the **Equality Act 2010** and **BS 8300** standards.

6.2 Inclusive design must be embedded from concept stage across all mobility, medical, and digital products, with ongoing usability testing by disabled users.

6.3 Reasonable adjustments will be provided to employees and service users in accordance with Section 20 of the **Equality Act 2010**, supported by internal training and policy enforcement.

Clause 7: Community Involvement and Philanthropy

7.1 As part of its public benefit commitment, the Company invests in communities through direct charitable donations, in-kind contributions, and employee engagement.

7.2 Since **1 January 2020**, Urathon Ltd has donated **£4,267.37** to the following UK-registered charities:

- **Macmillan Cancer Support**
- **British Red Cross Ukraine Appeal**
- **PDSA**
- **Wiltshire Air Ambulance**
- **RSPCA**
- **RCH100**

7.3 During the COVID-19 pandemic, the Company donated **over 1 million face masks** to local care homes and charitable organisations. These donations, valued at approximately **\$385,000**, were offered as unconditional, community-driven support.

7.4 All charitable giving complies with the **Charities Act 2011, Charity Commission guidance (CC14)**, and is reviewed by the Board to ensure accountability and alignment with Company objectives.

7.5 Full-time employees are encouraged to participate in approved volunteering initiatives and may be granted paid time off under the Company's Community Engagement Policy.

Clause 8: Sustainability and Environmental Stewardship

8.1 Urathon Ltd shall take all reasonable and proportionate steps to reduce its environmental footprint and align its activities with the **UK Net Zero Strategy, Environmental Protection Act 1990**, and **Climate Change Act 2008**.

8.2 The Company will implement an Environmental Management System (EMS) aligned with **ISO 14001**, to monitor emissions, energy use, and resource efficiency.

8.3 Procurement policies will prioritise vendors with low-emission processes, renewable energy usage, and circular economy alignment.

8.4 The Company shall eliminate single-use plastic in packaging by 2026 and replace high-carbon logistics with greener alternatives where practicable.

8.5 Environmental performance data shall be included in public disclosures, with clear targets for continuous improvement.

Clause 9: Eco-Friendly Design and End-of-Life Management

9.1 Products must be designed for repairability, recyclability, and safe end-of-life management, with consideration for **WEEE** and **RoHS** compliance.

9.2 A take-back or recycling programme will be offered for medical and mobility products, in accordance with **Waste Electrical and Electronic Equipment (WEEE) Regulations 2013**.

9.3 Packaging must use biodegradable or recyclable materials wherever feasible and be labelled to inform end-users of proper disposal.

Clause 10: CSR Reporting and Auditing

10.1 CSR performance and risks shall be reviewed quarterly by the Board and incorporated into the Company's wider risk management framework.

10.2 Independent ESG audits shall be conducted biennially, and findings shall be made available to shareholders and regulators upon request.

10.3 The Company will benchmark its performance against peer organisations and

international indices to support transparency, learning, and innovation.

Clause 11: Wheelchair User Engagement

11.1 Urathon Ltd will actively involve wheelchair users in co-creating solutions that meet the real-world needs of people with disabilities.

11.2 Regular consultations, design sprints, and post-market feedback shall inform continuous improvement of products and services for mobility users.

Clause 12: CGM-Specific Commitments

12.1 The Company's production and supply of Continuous Glucose Monitoring (CGM) devices shall prioritise energy-efficient processes, ethical labour, and medical safety.

12.2 CGM components must be certified for compliance with **UK RoHS**, **WEEE**, and **UK MDR 2002** (post-Brexit edition), ensuring product safety and environmental integrity.

12.3 CGM-related data systems must comply with **UK GDPR** and NHS interoperability standards.

12.4 Ethical sourcing for CGM suppliers shall be confirmed via external certifications or documented audits, particularly where supply originates from high-risk regions.

Clause 13: Stakeholder Engagement and Compliance

13.1 Urathon Ltd shall maintain regular stakeholder engagement through ESG reports, public forums, supplier reviews, and community consultations.

13.2 All CSR activity must comply with UK law, including Companies House disclosures, HMRC guidance on charitable giving, and legal obligations to shareholders, staff, and communities.

13.3 This Policy shall be reviewed annually and approved by the Board of Directors. Updates will reflect changes in regulation, strategy, or material stakeholder input.

Clause 14: Digital Responsibility and Cyber Ethics

14.1 The Company is committed to the ethical use of technology, including AI, software, and data analytics, ensuring systems are secure, fair, and do not perpetuate discrimination or inequality.

14.2 All digital tools and platforms must meet accessibility standards under **Web Content Accessibility Guidelines (WCAG) 2.1** and align with UK guidance on public sector digital inclusion.

14.3 Cybersecurity measures, including employee training, multi-factor authentication, and regular penetration testing, must comply with **UK GDPR, NIS Regulations**, and **ICO cybersecurity guidance**.

Clause 15: Diversity, Equity, and Inclusion (DEI)

15.1 The Company promotes a diverse, equitable, and inclusive workplace that reflects the communities it serves. DEI commitments extend to hiring, leadership, pay equity, and procurement.

15.2 Policies must be in accordance with the **Equality Act 2010**, and annual DEI data shall be reviewed to identify and remedy imbalances in representation or outcomes.

15.3 Suppliers and partners must also demonstrate inclusive practices or participate in the Company's supplier diversity programmes.

Clause 16: Responsible Marketing and Customer Integrity

16.1 The Company shall engage in fair, transparent, and non-exploitative marketing and communication practices, particularly for vulnerable customers (e.g. patients, carers, elderly).

16.2 All marketing must comply with the **Consumer Protection from Unfair Trading Regulations 2008, CAP Code**, and sector-specific guidance such as **MHRA Blue Guide** for medical devices.

16.3 Customer feedback will be continuously reviewed to ensure clarity, fairness, and accessibility of messaging, labelling, and service contracts.