CODE OF CONDUCT POLICY

TABLE OF CONTENTS

Clause 1: Purpose and Scope

1.1 This Code of Conduct Policy (hereinafter referred to as the "Policy") sets forth the ethical standards, statutory obligations, and professional expectations governing the conduct of all employees, directors, contractors, consultants, suppliers, and any other affiliated parties (collectively referred to as "Covered Individuals") associated with the Company.

1.2 This Policy is implemented in accordance with and in furtherance of applicable laws and regulations of the United Kingdom, including but not limited to the Equality Act 2010, the Employment Rights Act 1996, the Health and Safety at Work etc. Act 1974, the General Data Protection Regulation (UK GDPR), the Medical Devices Regulations 2002 (SI 2002 No. 618, as amended), and the Bribery Act 2010.

1.3 The Policy ensures that Covered Individuals act in a manner consistent with principles of transparency, accountability, equity, compliance, and public service integrity. It integrates statutory provisions applicable to Parliamentary Codes of Conduct, public and local government ethics, organizational governance, and industry-specific regulations.

Clause 2: Legislative and Regulatory Alignment

2.1 The Company commits to maintaining full compliance with statutory codes, including but not limited to:

2.1.1 Parliamentary standards as enforced by the Parliamentary Commissioner for Standards.

2.1.2 Ethical frameworks applicable to public bodies and local authorities under the Local Government Act 2000.

2.1.3 Obligations under the Employment Code and the ACAS Code of Practice.

2.1.4 Supplier Code of Conduct principles promoting responsible sourcing, human rights, and labor compliance.

2.1.5 Industry codes of conduct such as those issued by the Association of British Healthcare Industries (ABHI).

2.1.6 Equality obligations under the Equality Act 2010, prohibiting discrimination on grounds including but not limited to race, sex, disability, religion or belief, and age.

2.1.7 Requirements of the Medical Device Regulation (EU Regulation 2017/745) as retained in UK law, and the UK MDR 2002.

2.1.8 Good Manufacturing Practices (GMP) as interpreted through MHRA guidance and ISO standards.

Clause 3: Ethical Standards and Professional Conduct

3.1 Covered Individuals shall act with integrity, professionalism, and diligence in all interactions and shall ensure their conduct upholds the Company's reputation and the rights of all stakeholders.

3.2 Equality and Respect

Covered Individuals shall treat all persons with dignity, fairness, and impartiality. The Company shall take proactive steps to promote diversity, prevent harassment, and ensure compliance with anti-discrimination law. Recruitment, promotion, and workplace policies shall be aligned with the public sector equality duty under Section 149 of the Equality Act 2010.

3.3 Integrity and Objectivity

Covered Individuals shall ensure that decisions are taken independently, free from personal bias or external influence. Clinical claims, marketing communications, and scientific research shall be founded on robust, verifiable evidence, consistent with MHRA and NICE guidelines.

3.4 Accountability and Openness

All business activities, decisions, and communications shall be transparent and subject to scrutiny. Financial records shall be maintained in accordance with the Companies Act 2006 and auditing standards. The Company shall publish accurate and timely disclosures where legally required.

3.5 Conflict of Interest

All actual or perceived conflicts of interest must be disclosed to the appropriate compliance officer or governing body. Covered Individuals must not participate in any activity or transaction where personal interest may conflict with professional duty unless expressly authorized following full disclosure.

3.6 Confidentiality

Confidential and proprietary information, including personal data, trade secrets, and clinical results, must be protected against unauthorized disclosure or misuse. All processing of personal data shall be in strict compliance with the UK GDPR and the Data Protection Act 2018.

3.7 Whistleblowing

The Company shall implement and maintain a secure mechanism for the confidential reporting of misconduct. Whistleblowers shall be protected from retaliation in accordance with the Public Interest Disclosure Act 1998.

Clause 4: Regulatory Obligations for CGM Devices

4.1 All CGM devices shall comply with applicable laws and regulatory standards. Devices shall be classified, assessed, and authorized in accordance with the Medical Devices Regulations 2002 and MHRA requirements.

4.2 The Company shall operate a quality management system in compliance with ISO 13485 and maintain thorough documentation for all processes, including product lifecycle management, traceability, labeling compliance, and post-market surveillance.

4.3 Informed consent shall be obtained from all clinical trial participants, and ethical oversight shall be secured from a Research Ethics Committee (REC) approved by the Health Research Authority (HRA).

4.4 Patient safety, accuracy, and performance reliability of devices shall be paramount. CGM devices must be rigorously validated through clinical investigation and usability testing. Risk assessments shall be conducted and documented in accordance with ISO 14971.

4.5 Transparency and disclosure of any financial arrangements, gifts, or sponsorships involving healthcare professionals shall be disclosed pursuant to the Bribery Act 2010 and industry standards.

4.6 Supplier engagement must adhere to the Supplier Code of Conduct. Due diligence and periodic audits shall be performed to ensure compliance with ethical sourcing, environmental standards, and labor rights under the Modern Slavery Act 2015.

4.7 In the event of adverse incidents, the Company shall comply with its obligation to notify the MHRA within required timeframes. Incident investigations shall include root cause analysis and appropriate remedial action.

Clause 5: Implementation and Enforcement

5.1 Breaches of this Policy may result in disciplinary action, up to and including termination of contract or employment. Material breaches may also be reported to regulatory authorities.

5.2 The Policy shall be reviewed annually or upon any material change in applicable legislation or regulatory guidance.

5.3 All Covered Individuals shall acknowledge receipt of an agreement to this Policy in writing. Training shall be provided periodically to ensure awareness and understanding of obligations herein.