

Touchlight Code of Conduct

This Code of Conduct has been developed to provide a reference point for employees and consultants of Touchlight and those external to Touchlight with whom we collaborate and work more generally. This Code sets out the standards of ethical conduct and integrity expected and adhered to by Touchlight and those with whom Touchlight interacts more generally.

The Code supplements the policies contained within Touchlight's Staff Handbook which continue to apply in all respects to the members of the Touchlight team.

Our Values

Touchlight was formed from a desire to explore, innovate and develop DNA technologies with the goal of enabling the next generation of medicine and therapies for those in need. Behind this ambition lies certain key and fundamental principles, which underpin the ethics and behaviours of Touchlight. It is both an expectation and requirement of each person associated with Touchlight to operate ethically, in accordance with this Code of Conduct and with compassion and respect for one another.

Business Ethics

Acting ethically in business practices requires compliance with the spirit and letter of applicable laws and regulations and in line with Touchlight's values and standards. This Code of Conduct provides a guidance framework, however it is not a substitute for taking individual responsibility in the exercise of good judgement and common sense. You can seek guidance or support from members of the Touchlight Management team, key client relationship contacts or Touchlight legal in relation to any aspect of this Code. Additionally, any concern can be reported confidentially through whistleblowing@touchlight.com. Touchlight's non-retaliation policy protects people who raise concerns in good faith or seek advice.

Anti-Bribery and Corruption

Touchlight takes a zero-tolerance approach to any form of corruption including bribery, embezzlement, fraud, theft and the granting of improper inducement or advantage in an effort to obtain a desired outcome. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Touchlight employees and its business partners are prohibited from giving, soliciting or accepting any form of improper advantage, whether directly or indirectly, to or from any individual or organisation. Facilitation payments to government officials to expedite

performance of routine governmental actions are likewise strictly prohibited, regardless of whether such payments are considered customary in accordance with local cultural standards.

Perception matters in this context and behaviour could still be regarded as a bribe or grant of an improper advantage irrespective of the intention underlying the action. This is particularly true in the context of the giving and receiving of gifts and entertainment. Gifts or hospitality are permitted if they are not unduly lavish or extravagant and objectively reasonable and appropriate in the context of building relationships or marketing our products and services.

Antitrust and Fair Dealing

Antitrust laws - also known as competition laws - seek to protect fair competition and prevent conduct which seeks to prevent, restrict or disrupt competition such as price fixing or market sharing arrangements which distort free market economics. Touchlight respects the legitimate business interests and intellectual property rights of all of those with whom we interact. Antitrust and fair competition laws are strictly enforced and form the minimum ethical and behavioural standards which Touchlight expects from its staff and external collaboration partners.

Conflicts of Interest

Conflicts of interest arise where competing interests impair an ability to make objective, unbiased business decisions. The conflict may arise through personal interests outside of work or those of a close family member. They may be financial in nature or relate to recruitment or dealings more generally. Touchlight expects all of its staff and collaborators to act at all times with impartiality, independence and integrity and avoid being, or giving the appearance of being, in a position which may result in an actual or perceived conflict of interest. Touchlight personnel are required to report any actual or potential conflict of interest of which they become aware, either to their line manager or the Chief of Staff of the Group.

Trade Sanctions

Sanctions, including export and import controls, must be observed and adhered to strictly by Touchlight and those with whom we transact more generally. Sanctions can take the form of financial sanctions (restricting payments made / received, commercial investments and arrangements), trade sanctions (restricting the import/export of goods and services) and travel bans. Touchlight acknowledges that it is operating in a sector where awareness and monitoring of sanction compliance is increasingly essential.

In a modern global economy with ever increasing use of sanctions, knowing details of clients and supply chains has never been more important. Touchlight will not enter into business

relations with individuals or entities where we are uncertain of or have concerns about their ordinary place of business, their corporate ownership structure or their business objectives. If Touchlight is supplying custom material we will ensure we have an appreciation of the application or potential application of the material manufactured. If there are any concerns in relation to sanctions compliance or a red flag has been identified in relation to any of Touchlight's business dealings (existing or prospective), the matter should be promptly raised with Touchlight legal.

Economic Crime and Corporate Transparency

Touchlight is committed to upholding the highest standards of integrity and transparency in all aspects of its operations. In line with the Economic Crime and Corporate Transparency Act 2023, we recognise our responsibility to prevent and detect fraudulent activity within our organisation and across our business relationships. The Act introduces a new corporate offence of 'failure to prevent fraud', which applies to large organisations where an associated person commits fraud for the benefit of the organisation or its clients. Touchlight adopts a zero-tolerance approach to fraud and will implement proportionate and risk-based procedures to prevent such offences, including risk assessments, training, and clear governance structures.

All our employees, contractors, and third-party representatives are expected to act honestly and transparently and must not engage in or facilitate any form of fraud, false accounting, or misrepresentation about our business. Individuals must also report any suspected fraudulent activity or concerns through the appropriate internal channels, including our confidential whistleblowing service. Touchlight's leadership is committed to fostering a culture of openness and accountability and will ensure that all reasonable steps are taken to prevent fraud and comply with the guiding principles set out in the Act.

Respectful and Safe Workplace

Touchlight is committed to providing a working environment free from discrimination, harassment and bullying and ensuring all people are treated, and treat others, with dignity and respect. Touchlight staff and collaborators are asked to speak up should they feel they have been subjected to or witnessed such behaviours being perpetrated against others. Touchlight does not tolerate any abusive behaviours in the workplace.

Touchlight is committed to providing a safe and secure workplace in accordance with all applicable best practices, including environmental health and safety legislation. We strive as a business for continuous improvement and Touchlight employees are encouraged to identify areas for such and are expected to assume personal responsibility for safety, security, health and environmental protection commensurate with their knowledge, ability and experience.

Quality Standards

Touchlight believes that maintaining high quality standards is essential to success and the legitimate expectation of customers. It is also every employee's responsibility. Touchlight is committed meeting all applicable legal and regulatory requirements, alongside the expectations of its stakeholders, regarding the quality, safety and efficacy of its products and services. Touchlight requires its business partners to adhere to its high quality standards.

Records Management and Data Privacy.

Information, records and data that are generated in the course of undertaking Touchlight business activities ("Records") are a valuable asset and (unless otherwise agreed with the stakeholder) belong to Touchlight. Records in the control of Touchlight are retained in an appropriately secure, confidential and accurate manner which is essential for the protection of business interests, fulfilment of regulatory obligations and to drive scientific innovation. It is the responsibility of each Touchlight employee to ensure Records are protected from loss or misuse, their integrity is maintained, retained and destroyed in accordance with Touchlight's document retention policies and can be easily found and accessed as necessary.

Touchlight is fully committed to compliance with the requirements of the UK GDPR, the Data Protection Act 2018 and all other applicable data protection legislation currently in force. Touchlight employees are responsible for ensuring that personal data held and processed as part of their role at Touchlight is stored securely and not disclosed to any unauthorised third party. Should a personal data breach occur in relation Touchlight's data privacy obligations this must be notified immediately to the appropriate line manager and reported via dpm@touchlight.com.

Corporate Communications

Touchlight will endeavour to ensure that its communications are always clear, accurate, consistent and aligned to our corporate brand, irrespective of the media used. All advertising, promotional claims and marketing materials, in any format, are subject to diligent internal approvals before release. Employees are required to avoid making any social media communications which could damage Touchlight's business interests or reputation, purport to express opinions on Touchlight's behalf or which post content concerning sensitive business-related topics.

Insider Information and Trading

Insider information is non-public information concerning a company or its business partners which a reasonable investor would consider important in deciding whether to buy or sell shares in that entity. Touchlight employees or collaborators who learn about insider information in the performance of their duties, whether intentionally or by coincidence, are considered insiders. Insider information must be kept strictly confidential and not disclosed or used to make or recommend investment decisions.

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