CODE OF CONDUCT

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OUR GUIDING PRINCIPLES

This Code of Conduct defines the principles that guide how we conduct business. It sets the standards for how we collaborate, communicate and act - internally and in our interactions with customers, suppliers and partners.

By adhering to these principles, we protect our license to operate and uphold our commitment to responsible, compliant and reliable business practices.

We comply with applicable laws and regulations. Our standards are based on internationally recognized conventions, including relevant International Labour Organization (ILO) conventions and the United Nations Universal Declaration of Human Rights.

Where local legislation is stricter than this Code of Conduct, the stricter rule applies. In the event of any conflict between this Code and applicable law, the law takes precedence.

These principles apply throughout our operations and supply chain, and across the entire lifecycle of products and services, from sourcing and manufacturing to distribution and final use.

APPLYING THE CODE OF CONDUCT

Employees, business partners and suppliers are expected to comply with this Code of Conduct.

We are committed to implementing these principles throughout our operations and relevant supply chains. This includes identifying potential compliance risks, communicating applicable requirements to relevant parties and taking appropriate measures to monitor compliance and address identified concerns.

While this document cannot address every possible situation, all individuals are expected to exercise sound judgment and act in accordance with the principles outlined here. If uncertainty arises, employees should seek guidance from their manager.

Speaking up

We encourage open communication and a culture where employees feel comfortable raising concerns about conduct that may be inconsistent with this Code of Conduct.

Employees may raise concerns with their immediate manager or any member of the Board of Directors, depending on whom they feel most comfortable approaching.

We do not tolerate retaliation against anyone who raises concerns in good faith. All matters are handled confidentially to the extent possible.

OUR COMMITMENT TO EACH OTHER

An inclusive and respectful working environment

We treat each other with respect and value diverse perspectives and backgrounds. We are committed to maintaining a professional, inclusive and safe working environment free from harassment, discrimination or inappropriate behavior.

We do not tolerate discrimination based on age, ethnicity, gender, religion, social background, disability, political opinion, pregnancy, sexual orientation or any other characteristic protected by applicable law.

A safe workplace

We provide safe and healthy working conditions in accordance with applicable occupational health and safety regulations. We work proactively to identify and mitigate potential risks to employee health and safety.

We ensure that appropriate health and safety measures, training, protective equipment and emergency procedures are in place to protect employees and maintain a safe working environment.

Respecting Human Rights and Animal Welfare

We respect internationally recognized human rights and comply with applicable legislation.

We do not tolerate child labour, forced or involuntary labour, or human trafficking in our operations or supply chains. We respect the rights of employees to freedom of association and collective bargaining in accordance with applicable law.

We also respect animal welfare and are committed to minimizing any negative impact on animals in our operations and supply chain. We do not support unnecessary harm to animals, including animal testing, unless required by applicable law.

Working Conditions and Employment Standards

We are committed to fair and lawful employment practices throughout our operations and supply chains.

We respect applicable legislation governing working hours, overtime, rest periods, wages and statutory leave. We support fair employment conditions, including transparent employment agreements, timely payment of wages and respect for employees' rights.

We expect our suppliers and business partners to uphold the same principles and comply with applicable labour laws and internationally recognized labour standards.

OUR COMMITMENT TO INTEGRITY & ETHICS

We conduct our business with integrity, transparency and accountability.

Conflicts of interest

Business decisions must be made in the best interest of the company. Personal interests must not influence, or appear to influence, professional judgment.

Any potential conflict of interest must be disclosed and assessed by an independent party within the organization.

Fair competition

We are committed to fair and lawful competition.

Employees must exercise caution in any contact with competitors and must not exchange confidential or commercially sensitive information, including information related to prices, costs, margins, customers or market allocation. We do not enter or support any unlawful agreements or practices that restrict competition. Confidential information relating to the company, its partners or other third parties must always be protected. Any concerns regarding anti-competitive behavior or improper conduct should be reported in accordance with this Code of Conduct.

Gifts and benefits

We do not offer or accept gifts, benefits or reimbursements to or from third parties that may improperly influence, or appear to influence, business decisions or violate applicable laws or this Code of Conduct.

Inappropriate gifts may include monetary benefits such as cash or non-monetary benefits such as gift cards, shopping vouchers, dinners, entertainment, or anything of value that could influence professional judgment.

We comply with applicable anti-bribery and anti-corruption laws and, where relevant, industry standards such as the MedTech Europe Code of Ethical Business Practice.

Bribery and corruption

We do not engage in bribery or corrupt practices. We do not offer, give or receive anything of value to obtain an unfair advantage.

Fraud

We ensure the integrity in our business transactions and do not engage in fraudulent behavior against our company, any of our business partners or government entities. We do not manipulate or falsify any documents, submit misleading information or provide false statements. Fraud is a deliberate act of deception intended to secure an unfair or unlawful gain. It involves knowingly providing false information, hiding important facts, or manipulating a situation to benefit oneself or harm another party.

Money Laundering and Terrorist Financing

We do not engage in, facilitate or support money laundering or terrorist financing. We comply with applicable laws and regulations designed to prevent financial crime and conduct our business transactions with integrity and transparency.

OUR COMMITMENT TO DATA PRIVACY

Our relationships with business partners, customers and suppliers are built on trust. We handle personal and confidential information responsibly and in accordance with applicable data protection laws.

Confidential Information

Confidential information must be protected and only shared with authorized individuals. When sharing confidential information externally, appropriate confidentiality agreements must be in place.

Personal Data

We collect and process personal data only for legitimate business purposes and in accordance with applicable laws. Personal data is retained only as long as necessary and handled with appropriate safeguards.

OUR COMMITMENT TO PRODUCT COMPLIANCE AND SAFETY

Our purpose is to strengthen healthcare by delivering reliable single-use medical solutions aligned with customer and regulatory requirements, ensuring safety, efficiency and responsible use of resources.

Regulatory compliance and product safety are fundamental to our business. All products must meet applicable legal, safety and performance requirements and be supplied in a consistent and accountable manner.

Product Compliance and Safety

We:

- Work with manufacturing partners operating in accordance with ISO 13485 and applicable medical device regulations
- Align internal processes with relevant regulatory frameworks
- Ensure accurate product labeling, documentation and traceability

- Maintain oversight throughout our supply chain
- Monitor supplier adherence to contractual and regulatory requirements

Employees and suppliers must comply with applicable laws, standards and documented procedures.

We take appropriate action when product quality or compliance concerns are identified, including investigating non-conformities and implementing corrective measures in accordance with applicable requirements.

OUR COMMITMENT TO RESPONSIBLE SOURCING AND GOVERNANCE

As a supplier to healthcare institutions, we operate with integrity, transparency and accountability.

Responsible Sourcing and Supplier Standards

We are committed to responsible sourcing practices based on internationally recognized standards.

All suppliers must:

- Comply with the ILO Core Conventions
- Respect internationally recognized human rights
- Operate in accordance with applicable labour, environmental and anti-corruption legislation
- Maintain safe and lawful working conditions
- Avoid any form of forced labour, child labour or discrimination. Suppliers must not withhold wages, identity documents or require deposits from employees, and employees must be free to leave their workplace after normal working hours in accordance with applicable law.

Supplier selection and evaluation are based on compliance, reliability, performance and responsible conduct.

We reserve the right to request documentation or declarations to verify compliance and to conduct audits, either directly or through third parties, where deemed necessary to assess adherence to this Code of Conduct. Where concerns arise, we seek constructive dialogue and appropriate corrective action. Continued non-compliance may result in termination of the business relationship.

Conflict Minerals

We seek transparency regarding the use of conflict minerals in our supply chain and expect suppliers to comply with applicable regulations concerning responsible sourcing of minerals, including gold, tin, tungsten and tantalum where relevant.

Environmental Responsibility

We acknowledge the environmental impact of single-use medical products and are committed to continuous improvement.

We:

- Comply with applicable environmental and climate legislation
- Align operations with ISO 14001 principles
- Seek to reduce our environmental footprint, including energy use and greenhouse gas emissions
- Support responsible resource use and sustainable supply chain practices
- Align, where relevant, with selected UN Sustainable Development Goals related to responsible procurement, governance and supply chain practices.
- Seek to minimize waste and ensure responsible handling and disposal of hazardous materials in accordance with applicable regulations

Our Suppliers

We are committed to responsible sourcing and view our suppliers as long-term partners in delivering quality and value to our customers. Our ability to offer customer excellence is built on strong, transparent and responsible supplier relationships.

We expect our suppliers to uphold standards consistent with our Code of Conduct.

Our suppliers are also required to comply with our Supplier Code of Conduct, which sets out detailed requirements for responsible business conduct, human rights, working conditions, environmental responsibility and ethical practices.

We value open dialogue and constructive cooperation with our suppliers to support compliance, continuous improvement and responsible supply chain practices.