

Code of Conduct

ADDvise Group

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1. Background and purpose

ADDvise Group is committed to conduct all our business with integrity and in an ethical manner with respect for human rights, labor rights, sustainability, anti-corruption and care for the environment. The principles and guidelines outlined by the United Nations Global Compact (UNGC), the International Labour Organization (ILO), and the Organization for Economic Co-operation and Development (OECD) play an important role in setting the standards and fundamentals of ADDvise Group's operations. The purpose of this Code of Conduct is to ensure that all our employees operate in accordance with our standards and pursuant to internationally and nationally recognized standards, laws, guidelines, and regulations. If the provisions of this Code of Conduct demand higher standards than those required by national laws, this Code of Conduct shall prevail.

We are committed to high standards, and we expect all employees to comply with them. Non-compliance with this Code of Conduct is taken seriously and should be promptly addressed. We encourage all employees to report any deviations from this Code of Conduct by reaching out to ADDvise Group's legal team or by using our anonymous whistleblower function, accessible at <https://www.addvisegroup.com/about-addvise/whistleblowing/>.

ADDvise Group does not accept any violations of the Code of Conduct, and any employee violating this Code of Conduct may be subject to disciplinary action.

2. Audience

This Code of Conduct applies to all employees within ADDvise Group, including board members, the group management team, managers, and consultants.

3. Roles and responsibilities

The CEO of ADDvise SE is the owner of this Code of Conduct. All employees are expected to read, understand, and act in accordance with this Code of Conduct. Managing Directors are responsible for ensuring that the Code of Conduct is communicated effectively, understood by all employees, and consistently enforced throughout the organization. The Code of Conduct is subject to annual review and is approved by the Board of Directors.

4. Code of Conduct

4.1. Laws and regulations

All employees shall always comply with applicable laws such as environmental legislation, competition rules, labor law, fiscal legislation, and safety requirements, as well as other laws, regulations, and provisions in the countries in which we operate.

We adhere to, where applicable, industry regulations and recognize the importance of following applicable laws, ethical codes, and standards set by industry associations, such as MedTech Europe and AdvaMed in the US regarding interactions with healthcare professionals (HCPs).

4.2. Human rights

All business within ADDvise Group shall be conducted in a manner that is consistent and with respect to the internationally recognized human rights set forth in principles of the Global Compact and the International Bill of Human Rights.

Child labor and all kinds of forced or compulsory labor are strictly forbidden.

4.3. Health and safety

ADDvise Group is committed to ensure a good working environment. National law and regulations regarding health and safety shall be applied strictly.

Safety and protective equipment shall be provided and used by the employees when needed.

All employees shall be informed about possible health hazards and receive necessary training regarding processes on health and safety in their area of work. All incidents within ADDvise Group shall be followed up and remedied as required.

4.4. Labor rights

ADDvise Group is committed to an inclusive and diversified workplace with mutual respect between the employee and the employer.

Employees' fundamental right to decide to freely associate and be represented by labor unions, as well as an employee's right to refrain from joining a labor union shall be recognized.

Salaries and benefits shall be in accordance with local applicable laws and, if applicable, local collective agreements and/or local industry norms. ADDvise Group shall strive to enforce the principle of equal pay for equal work.

Any harassment, including physical, verbal, and non-verbal, threats or discrimination due to race, sex, religion, ethnic background, disability, or sexual orientation shall not be tolerated. Retaliatory actions against individuals who have reported concerns in good faith will be treated as a severe violation of our values.

Our recruitment process shall be based on competence and alignment with business culture and company values. All recruitment processes shall ensure equal rights and opportunities regardless of gender, gender identity or expression, ethnic affiliation, religion or other belief, disability, sexual orientation, and age.

For more details on our labor and equality practices, see ADDvise Group's Sustainability Policy.

4.5. Environment and quality

ADDvise Group is addressing environmental challenges, promoting environmental responsibility, and taking initiative to drive positive change. We recognize the importance of addressing potential environmental risks and assuming responsibility.

We shall comply with environmental legislation and strive for reduction in energy consumption and to reduce waste and emissions to air, ground, and water. Reduction and recycling of materials and products shall be applied. Hazardous waste shall be managed in a safe manner to minimize the risk of negative environmental impact.

We shall strive to measure and track environmental performance in terms of energy and resource efficiency, emissions, waste management and other applicable environmental impacts.

The products that ADDvise Group manufactures, markets, sells, and distributes shall be safe, effective, and of high quality when used by the customer. The quality work shall consistently comply with relevant regulations and standards and strive to meet or exceed the requirements, needs, and expectations of customers, authorities, and business partners.

For more details on our environmental practices, see ADDvise Group's Sustainability Policy.

4.6. Anti-corruption and healthy competition

All forms of corrupt conduct are strictly forbidden, and we have a zero-tolerance policy against corruption and bribery as defined in the UN Convention against Corruption. Employees are prohibited from engaging in or accepting any form of corruption, both directly and indirectly, including bribery, receipt of improper gifts, facilitation and protection payments, extortion, money laundering, and nepotism.

No offer, consideration, or benefit of any kind, which constitutes illegal or corrupt practice, shall be made to anyone, either directly or indirectly, as an inducement or reward for the execution of any agreement between any parties. ADDvise Group's employees may only accept business hospitality and gifts that comply with local regulations, are transparent, reasonable, have a clear business objective, and are appropriate for the nature of the business relationship.

All employees shall decline any solicitations for bribes or undue advantages and are prohibited from making or accepting facilitation payments to expedite routine procedures. Interactions with public officials and participation in public procurement shall be conducted with extra care to prevent corrupt practices, and employees are strictly prohibited from offering or accepting any benefit before or after a decision is made.

We are committed to making business decisions in the best interest of ADDvise Group and all employees are expected to exercise sound judgment, unaffected by private interests or divided loyalties. Employees shall work proactively to avoid conflicts of interest, and situations that may appear to conflict with our professional duty. If a conflict of interest does arise, employees are expected to promptly disclose it so that appropriate remedial action can be taken.

All sales and marketing of our products and services shall be conducted in accordance with relevant laws and regulations in the country concerned, and our products shall be advertised, promoted, and labeled responsibly. Any participation in cartels or other non-permissible cooperation with competitors, customers or suppliers are not accepted.

We are committed to engaging in an open dialogue with our stakeholders through professional and transparent communication. Activities and expressions in social media/forums that may damage our reputation and result in a possible conflict are prohibited.

For more details on our anti-corruption practices, see ADDvise Group's Sustainability Policy.

4.7. IT security and sensitive information

All use of company IT systems and equipment must align with their intended purpose of supporting and performing daily activities. Any misuse is strictly prohibited.

We respect privacy and handle personal data responsibly and in compliance with applicable laws and regulations. We collect, process, and store personal data from customers, consumers, employees, or third parties only for legitimate business purposes and only for as long as necessary.

Confidential information shall be handled with care and necessary precautions shall be taken to protect confidential information from unauthorized access or disclosure. This includes insider information which is unlawful to act upon or share for a personal financial gain and must be kept strictly confidential.

We value and safeguard our own physical and intangible assets and resources, such as copyrighted materials, trademarks, trade secrets, and other valuable information. Unauthorized use, copying, or sharing of our intellectual property is not allowed.

For more details on our IT and information practices, see ADDvise Group's IT Policy, Information Security Policy and Information and Insider Policy.

4.8. Political involvement and conflict zones

ADDvise Group is politically neutral. ADDvise Group does not make political donations or become involved with political parties.

All employees must ensure that no business is conducted in any way that supports war, conflict, extremism, money laundering, drug trade or slave trade. This includes not to violate any sanctions laws and regulations set forth by relevant authorities in the United States, the United Nations, the European Union including its member states, and the United Kingdom.

5. Implementation and monitoring of compliance

We expect that all employees are informed and comply with this Code of Conduct. Each Managing Director within ADDvise Group is responsible for informing their employees of this Code of Conduct and to ensure compliance. Monitoring the adherence to our Code of Conduct is a natural part of day-to-day operations.