

Contents

PURPOSE	2
DEFINITIONS	2
POLICY	3
1 Principle and Rules	3
1.1 Overview of the Anti-corruption Laws	3
1.2 Commercial Bribery	3
2 Business Courtesies	3
3 Conflict of Interest	4
4 Third Parties	4
5 Political Contributions	4
6 Charitable Donations and Educational Grants	5
7 Facilitation Payment	5
8 Solicitation	5
9 Books and Records, and Internal Controls	5
10 Implementation	6
10.1 Employee Training and Certification	6
10.2 Reporting Required and No-Retaliation	6
10.3 Consequences for Violations	6
11 Seeking Guidance from Legal or Compliance Departments	6
12 Violations of this Policy	7
SCOPE	7
RESPONSIBILITIES	7
EFFECTIVE DATE	7
REFERENCES	7
REVISION HISTORY	7

PURPOSE

Our Company including its subsidiaries, board of directors, officers, and executive and director, all management, Employees (collectively, our “Company”) and all our categories of Third Parties working on behalf of the Company recognize risks presented by Bribery and corruption on a global scale, especially in the medical devices industry. We are all committed to the development and maintenance of an effective anti-corruption compliance program. Such a program is founded in ethical behavior at all levels of the organization and is supported by adequate and tested internal controls. This Policy addresses a variety of contexts in which Bribery issues may arise.

DEFINITIONS

The Compliance Department maintains a comprehensive glossary of terms named [Definitions](#). These keywords and terms may change from time to time.

Applicable Laws

Bribery

Books and Records

Brazil Clean Companies Act

Bribery Act in UK

Business Courtesies

Charitable Donation

Close Relative(s)

Company

Compliance Committee

Compliance Department

CEP - Compliance & Ethics Program

Conflict of Interest

Consultant

Covered Recipient

Educational Grant

Employee(s)

Entertainment

GO – Global Office(s)

Guest(s)

HCP - Healthcare Professional

HCO – Healthcare Organization

FCPA - Foreign Corrupt Practices Act in USA

Facilitation Payment

Laws and Regulations

Legal Department

OECD - Organization for Economic Cooperation and Development New

PAC - Political Action Committee

Political Contribution

PO - Public Official

Policy(ies)

Procedure(s)

Retaliation

Third Party(ies)

Violation

POLICY

1 Principle and Rules

Under this Policy, our Company prohibits each Employee, including all Company's personnel, Employees of its domestic and foreign subsidiaries (Global Offices), and representatives of the Company, including each officer, shareholder, director, Consultant, agent, distributor, supplier, or other Third Party acting on behalf of the Company, from directly or indirectly engaging in corrupt activities anywhere in the world. We all must avoid actions that create even the appearance of improper conduct. Our Company prohibits everyone from offering or promising undue payments or anything else of value to Healthcare Professionals or Public Officials with the purpose of obtaining or retaining contracts or business or to provide any inappropriate business advantage to us, as those terms are defined below.

1.1 Overview of the Anti-corruption Laws

The relevant laws and treaties (for example the FCPA - Foreign Corrupt Practices Act in USA, Bribery Act in UK, Brazil Clean Companies Act, the United Nations convention against corruption, the OECD convention on combating Bribery of foreign Public Officials in international business transactions, and various national laws in countries around the world) prohibit undue offers or promises of payments to Healthcare Professionals or Public Officials to obtain or retain contracts or business. Such activity is illegal whether done directly or indirectly. Thus, a payment made to a Third Party acting on behalf of the Company (such as an agent, Consultant, business partner, representative, accountant, or supplier) with knowledge that the Third Party will give some portion of the payment to a Healthcare Professional or Public Official for an improper purpose violates these laws. Knowledge includes also a firm belief that a payment or offer is being made, will ultimately be made, or is substantially certain to be made to a Healthcare Professional or Public Official to obtain business.

1.2 Commercial Bribery

Various laws of many countries prohibit commercial Bribery, which involves corrupt dealing with the agents or employees of Third Parties to secure an inappropriate advantage over business competitors. It is a form of corruption which does not necessarily involve Public Officials or government-controlled healthcare facilities. It is our Policy not to engage in any conduct that constitutes commercial Bribery, including seeking, offering to, or accepting any illegal payment including but not limited to suppliers, customers, and intermediaries.

2 Business Courtesies

Business Courtesies must never be used to induce a Healthcare Professional or a Public Official to perform or not perform an official function or another improper purpose. Moreover, the provision of Business Courtesies must be lawful under applicable local law and be appropriate under the circumstances so as not to create an appearance of impropriety. The provision of Business Courtesies must comply with the specific Company Policy and its corresponding Procedures and must directly relate to the demonstration, promotion, or explanation of the Company's products or services, or pursuant to contractual obligations involving the Company's products or services. The provision of Business Courtesies, or any Entertainment, gifts, cash, cash equivalents, or any items of value to Guests or Close Relatives of Healthcare Professionals or Public Officials is strictly prohibited.

3 Conflict of Interest

A Conflict of Interest arises when Company's personnel, Employees or any other individual or Third Parties place their personal interests before the interests of our Company, and where such personal interests improperly influence or could be seen as improperly influencing their business judgments, decisions, or actions. Our Company prohibits Employees and Third Parties, and the related Close Relatives from: (i) obtaining a financial or beneficial interest in one of its suppliers, customers, or competitors; (ii) accepting money, gifts, excessive hospitality, loans, or other special treatment from any supplier, customer, or competitor of our Company; or (iii) using corporate property, information, or position for personal gain.

Having a Conflict of Interest can become a problem if an Employee or Third Parties tries to influence, or is perceived as influencing, the outcome of business dealings for direct or indirect personal gain. The most common examples: external engagements, including outside employment, personal financial interests, family and personal relationships, gifts, meal, travel, Entertainment, and other favors. It is mandatory to disclose any actual, potential, or perceived Conflicts of Interest to the Legal Department as soon as the Employee or Third Parties identifies that they may be in a Conflict of Interest situation.

4 Third Parties

Our Company can be liable for the conduct of Third Parties acting on its behalf, therefore we only engage Third Parties after undergoing a thorough due diligence process. Our Company prohibits indirectly conducting Bribery or corruption through a Third Party. The engagement of Third Parties must never be used to improperly create an incentive, reward or secure any improper business advantage for our Company.

5 Political Contributions

No funds or assets, including the work time of our Company Employees, may be contributed, loaned, or made available, directly or indirectly, to any political party or the campaign of any candidate for political office, even if such contributions are permitted by applicable laws. Political contributions should never be provided with the intent to bribe, influence, or gain any kind of undue advantage from a Public Official or Covered Recipient. This Policy does not prohibit our Company from making contributions to political action committees that the Company may decide to support, as approved by the Compliance Committee. This Policy does not prohibit our personnel from individually participating in political matters within their home countries. Individuals must choose their own involvement and participation in political activities on their own non-Company time and their own non-Company expense. Individual political contributions must make

no reference to our Company, or any persons associated with or affiliated with the Company other than the names and personal information of the individuals contributing on their own behalf. When individuals speak on public issues, it must be made clear that the comments or statements made are their own and not those of the Company. All questions concerning participation in political events or donations to political parties or candidates should be directed to the Compliance or Legal Departments.

6 Charitable Donations and Educational Grants

We believe in contributing to the communities in which our Company does business, and this Policy permits reasonable donations to charitable organizations and entities.

The main difference between grants and donations is that Educational Grants are given for a specific purpose (e.g., research or education) while Charitable Donations address humanitarian needs, (e.g., indigent populations or natural disasters). The Company, however, needs to assure that the Charitable Donations or Educational Grants will not be used to disguise illegal payments to Healthcare Professionals or Public Officials in violation of applicable laws. Even if a Public Official or Healthcare Professional does not receive a direct economic benefit, an otherwise legitimate Charitable Donation or Educational Grant to an organization with which a Public Official or Healthcare Professional is affiliated could be prohibited if transfer of value is made in exchange for obtaining or retaining business or securing an improper advantage. All requests for Charitable Donations or Educational Grants must be approved in advance in accordance with our CEP and must comply with this Policy and its corresponding Procedure(s). In general, our CEP requires that a specific request for a Charitable Donation or Educational Grant be submitted in writing with adequate information to the Compliance Department, and that such requests be approved by the Compliance Committee or designee in advance of any such Charitable Donation or Educational Grant being promised or offered. Any questions concerning Charitable Donations or Educational Grants should be directed to the Compliance Department.

7 Facilitation Payment

The Company prohibits facilitation payments. If you are unsure whether a payment qualifies as a facilitation payment, seek guidance from the Legal or Compliance Departments before making the payment.

8 Solicitation

The Company refuses to pay bribes or make illegal payments to anyone. This means that if a business partner, prospective business partner, industry competitor, Healthcare Professional, hospital, Healthcare Organization, or any Public Official requests or demands a bribe or other illegal payment, our Company's personnel must refuse the request or demand.

9 Books and Records, and Internal Controls

The relevant anti-corruption and recordkeeping laws also contain provisions that require the Company to (i) make and keep records which "in reasonable detail, accurately and fairly reflect" transactions and the disposition of assets, and (ii) maintain internal controls that will provide "reasonable" assurances that transactions are executed and recorded properly. Accordingly, we require that the Company books and records fully and fairly reflect all expenditures of our funds and prohibits any attempts to create false or misleading records. In addition, our Company has established and maintains a system of accounting procedures and financial reporting and controls to ensure that all

transactions and dispositions of assets occur only with proper authorizations, and that all such transactions are recorded accurately and in reasonable detail on the books, records, and accounts. Our Company's personnel must adhere to the accounting procedures and financial reporting and control requirements. These requirements apply to expenses incurred or transactions undertaken by the Company's personnel and to expenses incurred by Third Parties for which reimbursement from the Company is requested.

10 Implementation

10.1 Employee Training and Certification

The Company trains all necessary individuals including its directors, officers, and those Employees whose functions include contact and interaction with Healthcare Professionals or Public Officials, as necessary. Individuals may be required to certify that they have read and understand this Policy and will abide by the Policy. Any failure to complete training or a certificate that is requested by the Company may result in disciplinary action. In addition, the Company requires that Third Parties undergo similar training and certification. Documentation of trainings and certifications will be maintained by the Compliance Department. If the Company utilizes an online training management tool, such records will be stored within the online database.

10.2 Reporting Required and No-Retaliation

We established a whistle-blowing mechanism, through our website, to encourage and empower our Employees, business partners, customers, and members of the public to raise their concerns when they become aware of behavior that may be in violation of our Global Code of Business Conduct, our Company's Policies and Procedures including this one, applicable Laws and Regulations, or industry practices. All concerns are taken seriously and promptly investigated. Any form of Retaliation against anyone who raises a concern in good faith is prohibited.

10.3 Consequences for Violations

The penalties for Violation of anti-corruption laws can be severe. In the U.S. alone, the relevant laws can result in any of the following penalties for the Company and individuals involved in improper conduct:

- Criminal and civil penalties and multimillion dollar fines.
- Imprisonment.
- Suspension and/or debarment from government contracts.
- Denial of export licenses and privileges.
- Extradition to the U.S. to face charges.

Such penalties can be repeated in other countries wherever illegal payments are made. Note that U.S. federal law prohibits the Company from providing, reimbursing, or otherwise funding any fines imposed on any individual Employee charged with a Violation of applicable anti-corruption laws.

11 Seeking Guidance from Legal or Compliance Departments

Everyone who is confronted with any issues or business dealings that may implicate the corruption and Bribery matters contemplated by this Policy must immediately contact the Legal or Compliance Departments for guidance as to how to proceed or address the issue.

12 Violations of this Policy

Compliance with this Policy is mandatory, and failure to comply constitutes a Violation of this Policy. The Company will take appropriate disciplinary action against any Employee whose actions are found to violate this Policy or applicable laws, up to and including termination. The failure to report circumstances that may indicate a Violation or the unreasonable failure to detect a Violation of this Policy may also constitute cause for discipline, up to and including termination.

SCOPE

This Policy applies to all Company's personnel, Employees, and all categories of Third Parties providing services on the Company's behalf globally.

RESPONSIBILITIES

The Compliance Department is responsible for implementing this Policy.

EFFECTIVE DATE

This Policy and revisions thereto shall be effective as of the date of approval by action of the Compliance Committee. This Policy remains in effect unless and until it is revoked, revised, or superseded by the action of the Compliance Committee or designee.

REFERENCES

Global Code of Business Conduct

REVISION HISTORY

Approval Date	Effective Date	Revision	Purpose of Revision
13 Nov 2025	1 Nov 2025	-	Original Issue