



Third Party Code of Business Conduct

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PURPOSE OF THE CODE

- Purpose of the code



PURPOSE OF THE CODE

Advita Ortho is driven by the mission to enhance the lives of patients by empowering surgeons with high quality, transformative innovations in orthopedics.

We operate in a highly regulated industry where the laws that apply to our business are extensive and complex. We expect that our Third Parties will conduct their business not only in a lawful manner but also in compliance with the same high standards of integrity and ethics. This Third Party Code of Business Conduct establishes such expected standards, but is not meant to be all-inclusive, and there is an expectation of personal integrity from each of the Third Parties, their personnel, and individuals they interact with in their business dealings. The Third Party Code of Business Conduct highlights important legal, ethical, behavioral, and other requirements for parties who wish to be a Third Party of Advita Ortho. Our Third Parties are further expected to take reasonable and necessary steps to help ensure that their sub- contractors conduct business in compliance with this Code. Advita Ortho reserves the right to amend, modify, and add to this Code from time to time as Advita Ortho, in its sole discretion, believes it is appropriate.

It is expected that all Third Parties must conduct business in accordance with all applicable country, state, and local laws in the countries in which they operate. This includes, without limitation, laws relating to employment, human rights, the environment, health and safety, transparency, commercial business and trade. Advita Ortho reserves the right to decline to deal with Third Parties who do not comply with the law.



STANDARD OF EMPLOYMENT

- Child Labor Avoidance
- No Slavery and Human Trafficking
- No Discrimination, Retaliation or Harassment
- Avoiding Conflicts of Interest



STANDARD OF EMPLOYEMENT

Our Third Parties should commit to conducting their business in a manner that respects the rights and dignity of all people.

CHILD LABOR AVOIDANCE

Child labor is any work that deprives children of their childhood, their potential and dignity, and that is harmful to physical and mental development. Third Parties must not employ any person younger than the legal minimum age for working in the country in which such person is employed and must comply with all applicable minimum legal age requirements and other applicable child labor laws. Young workers must be above a country's legal age for employment and the age established for completing compulsory education. Child labor also includes hazardous work performed by young workers over the legal minimum age for work of the country. Hazardous work is defined as work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children, for example: work underground, underwater, at dangerous heights or in confined spaces, work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads, work under particularly difficult conditions such as work for long hours or during the night, etc.

EXAMPLES OF PROGRAMS TO AVOID CHILD LABOR:

- Clearly state the minimum age for general work and hazardous work in the hiring policy and job announcements.
- Hiring procedures and processes must include a robust age verification mechanism, which includes checking ID documents and in-person interviews and support younger worker with training.

Why it matters: child labor is an illegal practice and a violation of fundamental human rights.

NO SLAVERY AND HUMAN TRAFFICKING

Modern slavery is an umbrella term encompassing the risks posed by forced labor, prison labor, indentured labor, bonded labor, debt servitude, state-imposed forced



labor and the worst forms of trafficking where coercion, threats or deception are used to intimidate, penalize or deceive employees thereby creating situations of involuntary work and exploitation. Modern slavery may also be associated with the worst forms of child labor.

Why it matters: victims of modern slavery might face violence or threats, be forced into inescapable debt, or have their passport taken away and face being threatened with deportation. Third Parties must not support, promote or engage in the practice of slavery or human trafficking, and suppliers must comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

NO DISCRIMINATION, RETALIATION, OR HARASSMENT

Discrimination at any time, from recruitment to leaving employment, for reasons such as race, national or ethnic minority status, ethnicity, color, age, sex, sexual orientation, gender, gender identity or expression, social origin, disability, religion, political affiliation, union or association membership, pregnancy, marital status, family status or any other protected category as defined by local laws is not tolerated. All conditions of employment by Third Parties shall be based upon an individual's merit and ability to perform the responsibilities of the job. Third Parties shall promote a work environment free of discrimination, retaliation, physical or verbal harassment, bullying, or incivility. Third Parties must enforce a non-retaliation policy that permits employees to express their concerns about the workplace without fear of retribution or losing their jobs.

EXAMPLES OF HARASSMENT:

- An employee in a superior position may demand sexual favors from a subordinate employee in exchange for a benefit, such as a pay increase or promotion. They also may threaten consequences, such as termination, demotion, or withholding a promotion, if the subordinate does not comply.
- Discriminatory harassment involves unwelcome, offensive, and negative behavior or intentions towards an individual or group based on legally protected demographic attributes. This type of harassment at work may be verbal, written, or physical.

Why it matters: any company can be held responsible for the actions of its employees or associates, including independent contractors, for discriminating or harassing



conduct and failing to take appropriate actions. Third Parties shall take appropriate measures to promote and ensure that their workplace(s) are free from harassment of any type, harsh treatment, threats of violence, retaliation, corporal punishment, or other forms of physical, mental or emotional coercion.

AVOIDING CONFLICT OF INTEREST

Business judgments or decisions should not be influenced by personal interests. Conflicts of interest arise when personal, social, financial, or political interests interfere with the company's interests. Conflicts of interest may also involve family members and others with whom you have a close personal relationship, including Healthcare Professionals or Public Officials.

Third Parties are required to disclose current, relevant relationships, and situations that may constitute a real or perceived conflict of interest. If a Third Party has a relationship or situation involving Advita Ortho's employee or Healthcare Professional, either currently or in the future, that results in a potential conflict of interest.

The Third Party shall immediately notify Advita Ortho's Legal or Compliance Departments. This notification may be disclosed as well by utilizing one of the reporting methods available on Advita Ortho's webpage.

EXAMPLES OF CONFLICT OF INTEREST TO DISCLOSE:

- Third Parties must inform Advita Ortho if an employee of said Third Party, or their family member, has a relationship with Advita Ortho's personnel who can make decisions that will affect such Third Party's business.
- Additionally, Third Parties are required to disclose whether any of its employees, personnel, their family members, or its affiliates have a relationship with a Healthcare Professional ("HCP") or Public Official.

Third Party may not seek or accept any gifts, gratuities, payments, fees, services, privileges, vacations, or trips, loans or other favors from any person or business organization that does or seeks to do business with, or is a competitor of, Advita Ortho.

Why it matters: to ensure that business judgement is not influenced by personal interests, everyone in the Third Party must ensure that when they make decisions, such decisions are in the best interests of Advita Ortho. Conflict of interest can create an



appearance of impropriety, so by taking steps to identify, avoid, disclose, and manage any actual or potential conflicts of interest, is a commitment to act with transparency and integrity.



ANTI-CORRUPTION AND FAIR COMPETITION

- Interactions with healthcare professionals and government officials – Business Courtesies
- Prohibition against Corruption and Bribery
- Fraud
- Antitrust and Fair Competition
- Customs and Trade Laws



ANTI-CORRUPTION AND FAIR COMPETITION

INTERACTIONS WITH HEALTHCARE PROFESSIONALS AND GOVERNMENT OFFICIALS – BUSINESS COURTESIES

There are different laws and regulations related to the interactions with Healthcare Professionals and Public Officials in every country in the world. Third Parties must ensure that the acceptance or bestowing of any gift (in countries where gifts are allowed by law) or offer of hospitality to Healthcare Professionals or Public Officials cannot be construed as an attempt to secure favorable treatment from or to the Third Party. Gifts and hospitality will not be given, offered, or promised to be given, to receive anything of value for the purpose of improperly influencing any decisions concerning the Third Party or Advita Ortho.

Why it matters: we respect the independent judgment of healthcare professionals, as their decisions regarding the best products and treatment for their patients should never be compromised. We expect our Third Parties to never improperly influence Healthcare Professionals or Public Officials' decisions in their interactions with them.

PROHIBITION AGAINST CORRUPTION AND BRIBERY

Third Parties will conduct their business without engaging in any form of bribery, extortion, embezzlement, or corruption, including public or private bribery, or kickbacks. The Third Party will not use other Third Parties to commit acts of bribery or corruption.

Third Parties will abide by, and will cause all of its affiliates and the respective directors, officers, employees, agents, or representatives of such affiliates, its sub-contractors, as well as any other person acting on behalf of the Third Party or any of its affiliates to abide by the applicable laws and regulations and industry standards related to anti-corruption (for example, the US Foreign Corrupt Practices Act “FCPA”, or the UK Bribery Act, the French anti-gift law, the Brazil Clean Company act, etc.).

Anti-corruption laws are in place in every country in the world and these laws often apply across countries, which means that even if you do not live and work in a particular country, that country's laws may still apply to you. For example, the United States



Foreign Corrupt Practices Act applies to anyone who works for or on behalf of a United States company that does business internationally, or the United Kingdom Anti-Bribery Act that applies to any company having a relationship with the United Kingdom.

All Third Parties will immediately notify Advita Ortho's Legal or Compliance Departments if the Third Party should become aware of any behavior by itself or any related companies that violates or is likely to violate any of the applicable laws and regulations and industry standards related to anti-corruption and bribery. The Third Party may disclose any such violation or potential violation by utilizing one of the reporting methods available on Advita Ortho's website.

Why it matters: corruption erodes trust in both governments and businesses and reduces access to public services. To maintain trust, we do not engage in any form of bribery or corruption. We all must conduct our business with ethics and integrity and do not tolerate any form of bribery or corruption.

FRAUD

Fraud is a deliberate act (or failure to act) with the intention of obtaining an unauthorized benefit, either for oneself or for an entity, by using deception or false suggestions or suppression of truth or other unethical means, which are believed and relied upon by others. Third Parties must not engage in any fraudulent behavior, or in any kind of fraud, such as cheating, tricking, stealing, deceiving, misrepresenting, or lying for any personal or professional advantage.

Why it matters: fraud prevention ensures the integrity of financial transactions and operations within an organization, which is essential for operating legally and smooth functioning. This allows companies to carry on as normal, without the worry of a loss of funds, or a breakdown in internal processes which might need to be addressed.

ANTITRUST AND FAIR COMPETITION LAWS

Antitrust and anti-competition laws ensure that all competitors have a fair opportunity to compete. These laws are designed to maintain free and open competition. They determine how we can compete and interact with other companies, and they prohibit interactions between competitors that give an unfair advantage to those competitors or



unreasonably restrict competition for other competitors. Third Parties are required to comply with all applicable competition and anti-trust laws and regulations.

Third Parties shall conduct all business dealings in a fair and above-board manner. Third Parties must uphold fair business standards in advertising, sales, or competition, and prohibit agreements or actions that unreasonably restrain trade, are deceptive or misleading, or that unlawfully reduce competition.

Why it matters: competition drives innovation and leads to greater choice of higher quality products at competitive prices, benefiting our customers, patients, and society. Third Parties must compete fairly and ethically for all business opportunities and ensure all statements, communications, and representations are accurate and truthful.

ROBUST FAIR COMPETITION PRACTICES INCLUDE:

- Always bidding for tenders independently from competitors and never discussing bidding practices with competitors.
- Never entering into agreements, coordinated practices, or understandings that could restrict competition, and never exchanging information that is competitively sensitive.
- Never sharing with competitors pricing information or information that could affect pricing, including but not limited to information on costs, production, products and services, sales territories, distribution channels, customers, or other non-public business information.
- Never placing business partners at an unjustified disadvantage.
- Only gathering information about competitors using legal and ethical means.

CUSTOMS AND TRADE LAWS

All the countries worldwide have implemented trade laws that govern the import, export, and transport of products and materials across borders. Third Parties shall identify and comply with all applicable trade sanctions and export control laws. Violation of these laws or restrictions result in severe civil or criminal penalties.

Third Parties should confirm that: i) neither they nor their affiliated companies, shareholders or directors have been previously, or are currently, placed on one of the



following restricted parties lists: the U.S. List of Specially Designated Nationals (“SDNs”) and Blocked Persons, maintained by the U.S. Treasury Department Office of Foreign Assets Control; the Debarred List and non-proliferation sanctions lists maintained by the U.S. State Department; the EU Consolidated List of Designated Parties; and the Sanctions Embargoes List of Switzerland; and ii) they are not currently owned 50% or more, individually or in the aggregate, by one or more SDNs. Third Parties should immediately inform the Company if during the course of dealings with our Company if: (a) they, their affiliated companies, shareholders, or directors are placed on one of the restricted parties lists referenced above; or (b) they become owned 50% or more, individually or in the aggregate, by one or more SDNs.

Why it matters: complying with customs regulations, export controls, and trade sanctions laws allows us to deliver our products in a timely manner to patients who need them.



ENVIRONMENTAL SUSTAINABILITY AND SAFETY

- Business Continuity and Crisis Management
- Health Safety
- Environmental Responsibility



ENVIRONMENTAL SUSTAINABILITY AND SAFETY

BUSINESS CONTINUITY AND CRISIS MANAGEMENT

It is our Third Parties' responsibility to ensure uninterrupted supply of key products and services to our Company's customers and patients. This means implementing appropriate business continuity and disaster recovery measures to ensure the uninterrupted delivery of our products and services in the event of an emergency or natural disaster.

Why it matters: our products improve people's lives. Our customers, patients, and our business rely on the continuous supply of our products.

HEALTH SAFETY

Third Parties shall safely maintain their work environments and meet all relevant environmental, health, and safety regulations.

Third Parties shall maintain a clean, safe, and healthy environment to include appropriate controls, safety procedures, preventative maintenance, and appropriate protective equipment in compliance with all applicable laws and regulations. Third Parties shall maintain written safety and health policies and emergency plans systems to maintain such a work environment and minimize workplace accidents and injuries.

EXAMPLES OF SAFE WORKING CONDITIONS:

- Using equipment with proper safety controls or in a safe manner.
- Performing tasks with proper training.
- Following safety guidance and using personal protective equipment.
- Do not take shortcuts – always follow your workplace health and safety procedures.



Why it matters: to protect and promote the health and safety in the communities in which we operate. This depends on the continuous cooperation of everyone.

ENVIRONMENTAL RESPONSIBILITY

Third Parties will act in an environmentally responsible manner. Third Parties shall comply with applicable environmental laws and regulations and remediate any environmental problems they may cause. Third Parties must commit to protecting the environment and work to sustain, protect and restore the environment, by such means as energy conservation, recycling, and proper disposal of waste.

Why it matters: minimize the environmental impact of our activities and products over their lifecycle to protect the environment for future generations. Third Parties shall strive to implement and maintain business operations which are environmentally friendly.



CONFIDENTIALITY AND PRIVACY

- Confidential Information and Cyber Security
- Protecting Personal Information
- Communication and Social Media
- Ethical use of Information



CONFIDENTIALITY AND PRIVACY

CONFIDENTIAL INFORMATION AND CYBER SECURITY

Third Parties with access to confidential Advita Ortho information must not disclose such information to other parties without the Advita Ortho's written consent. In addition, Third Parties must respect intellectual property rights, and the transfer of confidential information must be done in a manner that protects intellectual property rights.

Confidential information includes non-public information that might be useful to competitors or harmful to Advita Ortho or to our customers if disclosed.

EXAMPLES INCLUDE:

- Proprietary information, such as device designs, strategic plans, engineering, technical, and or scientific techniques, manufacturing processes of Advita Ortho products.
- Trade secrets, trademarks, and other intellectual property.
- Non-public financial information, such as pricing list, sales plans, etc.
- Potential acquisitions and investments.
- New product information and marketing plans.
- Customer, third-party, and employee lists.
- Clinical data, personnel records, patient information.

Property assets include:

- Physical assets: such as office supplies, furniture, mobile devices, computer equipment, facilities, machinery, products, and materials.
- Informational assets: such as information and data related to Advita Ortho business, wherever it's stored.
- Financial assets: such as money, stocks, bonds, loans, and deposits.
- Intangible assets: such as our reputation, ideas, intellectual property, designs, and trade secrets.



We expect our Third Parties to maintain the confidential nature of this information and to implement sufficient controls to prevent the unauthorized access, use, and disclosure of such information.

WE ASK OUR THIRD PARTIES:

- To comply with good storage and document retention practices in maintaining confidential and proprietary information. Secure documents, data, and devices when not being used.
- Do not share passwords for Advita Ortho networks.
- Use caution when transmitting electronic information outside of Advita Ortho's secure networks.
- Avoid downloading Advita Ortho's files on an external device.
- Confidentiality or Non-Disclosure Agreements, or other confidentiality obligations must be complied with. All requests for Confidentiality/Non-Disclosure Agreements should be directed to Advita Ortho's Legal Department.
- Be mindful when discussing confidential information and avoid doing so in public places, such as elevators, public transportation, restaurants, and social media.

Why it matters: to protect confidential data and technology and ensure that information is kept safe from theft, loss, misuse, or disclosure.

PROTECTING PERSONAL INFORMATION

When Third Parties handle personal information in the performance of services on the Company's behalf, we require them to ensure that such information is protected against unauthorized disclosure and is appropriately safeguarded. Personal information, also known as personally identifiable information (PII), is any information that can directly or indirectly identify an individual.

EXAMPLES INCLUDE:

- General information, such as names, dates of birth, addresses, or email addresses.



- Government-issued identification numbers, such as passport numbers or national identification numbers.
- Log-in credentials, such as usernames or passwords.
- Financial information, such as credit card numbers or account numbers.
- Health-related information, such as medical records or images.

This information must be transmitted and stored in compliance with all applicable privacy laws including, not limited to international laws such as the EU Global Data Protection Regulation (GDPR). Personal information should only be collected for a legitimate business purpose, such as the post-market monitoring of our products, and should be shared only with those individuals with a legitimate need for such information. Personal information should not be retained past the fulfillment of its business purpose.

Why it matters: privacy laws vary from country to country,. In any case, Third Parties are responsible for retaining all personal information and communications exchanged with and on behalf of Advita Ortho.

COMMUNICATION AND SOCIAL MEDIA

Connecting with others via social media is a great way to build and strengthen networks, as well as create new business opportunities. However, it is important to keep in mind that not everything is appropriate or allowed.

Social media includes any application or website that allows a Third Party to share its content online. Examples include social networking sites, such as Facebook, Instagram, YouTube, TikTok, X (formerly Twitter), or LinkedIn, as well as personal blogs.

Third Parties must communicate with and about Advita Ortho and its products in a way that is truthful, accurate, and not misleading. Communication should always be thorough, informative, and compliant with related regulatory clearances and guidelines.

Why it matters: we expect our Third Parties to ensure their communications are truthful, accurate, and not misleading.



ETHICAL USE OF INFORMATION

The internet age has made it very easy to readily access information about virtually any topic. It is important to be aware of developments in the marketplace, including the activities of our competitors, but we must be careful to gather such information ethically and lawfully. Third Parties must never use or disclose confidential or proprietary information or violate any confidentiality or non-competition agreements you hold with other parties. Third Parties should never use or ask other Third Parties to gather information in an unethical or illegal manner.

Why it matters: Third Parties must respect the confidential and proprietary information of our competitors just as we expect them to respect ours. Any violations of this policy will be grounds for disciplinary action, up to and including termination of the contractual relationship with Advita Ortho.



MANAGEMENT

- Maintaining accurate business and financial records management
- Transparency
- Audit
- Training



MANAGEMENT

MAINTAINING ACCURATE BUSINESS AND FINANCIAL RECORDS MANAGEMENT

We expect that all our Third Parties are responsible for ensuring that the business or financial records that they generate, internal controls, and internal policies and procedures are properly and clearly documented and recorded. Third Parties shall ensure that all relevant internal financial controls and approval procedures are followed and that the retention and archival of books and records are consistent with the Third Party's own standards, and the Third Party's relevant tax, accounting, and other applicable laws and regulations. Records include all electronic and paper documents that contain data, communications, policies, and procedures.

Third Parties should never make any disclosure of business or financial records related to Advita Ortho to another Third Party, the public, or governmental agency without first notifying and obtaining the authorization of Advita Ortho's Legal Department.

"Off-the-books" accounts, or false or deceptive entries in the Third Party's books and records are prohibited. All financial transactions must be documented, regularly reviewed, and properly accounted for.

Why it matters: an unauthorized disclosure of business or financial records could be subject to civil and criminal liability. We expect our Third Parties to maintain proper oversight and accountability over business assets to meet all financial, legal, and regulatory obligations in their country and ensure that they remain a trusted partner.

TRANSPARENCY

Many countries require a higher level of compliance from the medical sector. To avoid abuse or undue influence, medical device manufacturers are subject to transparency requirements regarding their spending in healthcare in multiple countries.

Manufacturers and distributors of medical devices and supplies must report, periodically and transparently, payments made to or for (also known as transfers of value) Healthcare Professionals, Healthcare Organizations and Public Officials. Our Third



Parties are responsible for ensuring compliance with such requirements and reporting disclosures.

Why it matters: there are multiple laws and requirements for these public disclosures to consider in many countries. Third Parties are responsible for accurately documenting business activities, payments, and expenses involving Healthcare Professionals, Healthcare Organizations and Public Officials. Carefully consider meeting locations, the need for travel and meals, and be mindful of how actions on behalf of Advita Ortho may appear to the public.

AUDIT

Advita Ortho may audit (or engage a Third Party to audit on their behalf) the Third Party at any time upon reasonable prior notice, to ensure its compliance with the standards in this Third Party Global Code of Business Conduct, and to confirm the compliance program in place and all payments made for or on behalf of Advita Ortho. Supplemental audit provisions may also apply as agreed between the parties.

Third Parties shall prepare and maintain books and records that document accurately and in reasonable detail all matters related to business for or on behalf of Advita Ortho, accounting for all payments (including hospitality, or anything else of value) made for or on behalf of Advita Ortho, or out of funds provided by the company.

Why it matters: these inspections are important because they help ensure businesses operate legally, ethically, and complying with government regulations and industry standards.

TRAINING

Third Parties shall educate their employees to make ethical decisions in compliance with laws, regulations and contractual requirements. Advita Ortho also has the right to provide compliance training.

Why it matters: training is fundamental to ensure that our Third Party is up to date with the Advita Ortho's standards and values.



HOW TO REPORT

- How to Report



HOW TO REPORT

Third Parties are all accountable for understanding and following this Third Party Code of Business Conduct.

Third Parties shall implement appropriate programs, policies, and procedures to help ensure compliance with the standards and obligations set forth in this Third Party Code of Business Conduct, including designating one or more of its management staff to be responsible for monitoring their compliance with this Code.

Third Parties are expected to promptly take corrective action to address any deficiencies identified with respect to compliance with this Code.

Third Parties are required to report any violations against this Third Party Code of Business Conduct. If a Third Party is found to be in violation of this Code, Advita Ortho will take all appropriate measures to address the violation. Advita Ortho reserves the right to terminate its relationship with any Third Party for failure to comply with this Third Party Code of Business Conduct.

HOW TO REPORT

For matters related to Advita Ortho and this Third Party Code of Business Conduct, there are different ways to seek guidance or raise ethical concerns. You can:

- Talk to Advita Ortho's Legal or Compliance Departments.
- Send an email to complianceofficer@exac.com.
- Use Advita Ortho's reporting system. With this option you can also decide to report directly or remain anonymous. Our reporting system is approved to support applicable whistleblower laws in the countries where we do business. Your report will be noted and followed up on in a discreet and timely manner.
 - Visit our webpage Advita Ortho Reporting System.
 - Call one of the phone numbers to report your concern.



- Send a written report via the Reporting System. You also have the option to record a voice message to attach to the report. Your voice will be automatically distorted and unrecognizable.

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