



## Code of Conduct



## Introduction

At Medicom, we are committed to conducting business with integrity and continuously strive to do the right thing in relation to our employees, customers, communities and partners. In order to operate and maintain our reputation as a company that does business with integrity, we must each learn, understand and comply with the Medicom Code of Conduct.

## Who must follow the Code?

All employees or anyone working on behalf of Medicom or its affiliates are required to understand and comply with the Code of Conduct, Company policies and laws that govern their activities. Together with other Company policies, the Code helps us make the right decisions and take the right actions, regardless of where we work or the type of work we do. The Code of Conduct also applies to individuals and companies conducting business on our behalf.

## Fostering a healthy workplace

### We Do Not Tolerate Discrimination, Harassment or Violence

At Medicom, we promote an inclusive workplace. We thrive on the contributions of our employees, which is strengthened by the diversity of our workplaces.

Our Company provides equal opportunities for employment. We do not tolerate discrimination based on characteristics such as age, gender, race, ethnic background, disability, sexual orientation, gender identity, national origin or religious beliefs.

Acts of harassment, bullying or violence against or by any employee or third party are not tolerated, and we all have an obligation to raise any such acts that we witness to a Manager, Human Resources Representative, or the Ethics Committee. Allegations will be investigated, and corrective actions will be applied to ensure a safe working environment.

### The Health & Safety of our employees is paramount

The health and safety of our employees is of paramount importance at Medicom. We each have a responsibility to foster an environment of psychological and physical well being. That means we are always treating each other with respect and upholding the highest standards of safety in all our facilities.

All employees must adhere to the standards outlined in the Health and Safety policies of their respective country and/or work site. Health and Safety is not considered solely a management responsibility, but a collective and individual obligation. If we see something or witness someone compromising the physical or psychological well being of our colleagues, we have a duty to raise it and seek corrective action.

### We use social media responsibly

We understand the power of social media and digital communication channels and commit to using them responsibly. We recognize that our conduct on social media may impact the way others view who we are and what we stand for as a Company and, therefore strive to maintain a respectful tone in our activities



and posts. If we wish to feature images or videos of our colleagues, we must first obtain permission from those individuals and be mindful of the type of content created and posted. We practice good judgement when creating, posting or engaging in social media activity.

## How we Conduct our Business

### We Avoid and Disclose Conflicts of Interest

We are committed to acting in the best interest of Medicom and avoid placing ourselves in a conflict of interest. A conflict of interest arises when our personal interests or that of a third party compete with the interests of Medicom. We all have an obligation to conduct business in the best interests of Medicom by avoiding actual, potential or perceived conflicts of interest.

Examples of a conflict of interest include:

- Influencing supplier selection to favour those owned or operated by immediate family, or relatives
- Failing to disclose a close connection during a vendor selection process in which you are a decision maker or will be involved in managing if selected
- A direct or indirect reporting relationship between a manager and his or her relative or partner

How to avoid these types of situations:

We recognize that personal relationships exist in the business world and can at times come into play during the course of conducting business for Medicom. The key to avoiding an actual, perceived or potential conflict is in disclosing it to your Manager, Human Resources or the Legal Department with the aim of resolving the situation in a transparent manner.

### Business Partners

As a trusted partner to governments and health care professionals around the world, we have a responsibility to take special care in how we manufacture, label, store and distribute our products. With this in mind, it is important that we choose our vendors, suppliers and business partners with care. Selection and engagement with third parties should be based on their ability to reliably deliver quality products and service levels.

### Anti-corruption and anti-bribery laws

Medicom takes a strong stance against corruption and bribery consistent with the anti-bribery and anti-corruption laws that exist in many countries around the world. We do not engage in bribes, fraudulent conduct, kickbacks, illegal payments and any other offers of value that may inappropriately influence or secure an improper advantage with a government official, healthcare professional or customer.

Gifts offered to third parties (such as customers, suppliers, or other business partners) should be modest and appropriate so as not to create the appearance of improper influence or advantage. Gifts should only be offered under customary or cultural occasions and should never include cash or cash equivalents.

For additional guidance on this topic, consult our anti-bribery and anti-corruption policy.



## Global trade

As a global provider of healthcare products, we conduct import and export transactions every day and must comply with all applicable local, regional and international trade laws, rules and regulations. We also respect trade sanctions and import/export restrictions imposed by governments that are applicable to our activities.

## Human rights

We are committed to acting ethically in all our business dealings by implementing and adhering to systems and controls that support universal human rights.

Our commitment to human rights across our value chain—from our own employees to our supply base and the communities in which we live and work—is articulated in our Corporate Social Responsibility (CSR) policy.

All employees are required to familiarize themselves with the policy and ensure the principles are respected in all our business dealings.

## Privacy

In the course of conducting business, we collect and store personal information about employees, business partners, customers and others, such as addresses, birth dates and financial, medical and other information. When we collect and process personal information, it is our responsibility to comply with the applicable laws that prescribe how to responsibly collect, store, use, share, transfer, and dispose of personal information, and we strive to comply with those laws everywhere we operate.

We follow best practices in the handling of confidential information. Personal information should be collected only for legitimate business purposes, strictly shared only with those who are authorized or have legitimate reason to receive it and retained only for as long as necessary on secured systems.

We do not store company information on employee-owned devices and never send this type of information to third parties that are not permitted to receive it. We always ensure that third parties with access to personal information are contractually obligated to protect it in accordance with applicable data security standards.

Our responsibility to keep information confidential continues even after our employment with Medicom ends.

## Questions?

If you are not sure how to respond to certain situations, below are some questions we can ask ourselves:

- Is the conduct fair, ethical or legal?
- Does the conduct align with the Medicom Code of Conduct and related policies?
- Would I be comfortable if what I am doing, or witnessing was made public in a newspaper, on television or social media?



If the answer to any of the questions above is “No”, the next step is to disclose to your Manager, Human Resources or Legal Department.

At any time, if you have doubts about a situation you are personally involved in or witnessing, you must communicate with the contacts listed above.

---

X

A handwritten signature in black ink, appearing to be "SL", written over a horizontal line.

---

Guillaume Laverdure  
Chief Operating Officer