

Group Global Code of Conduct

Introductory message from the CEO/Management

As a global company with business operations that span across over 100 countries around the world, ELITech is subject to many different laws, regulations and other requirements that vary across the countries in which we operate.

Whilst at times, each of us will be faced with situations in which the right course of action may be difficult to determine, we are all collectively and individually expected to adopt and maintain the highest standards of integrity at all times.

This Code of Conduct provides you with rules and guidelines that you should follow in order to ensure compliance with applicable laws, regulations and other requirements, along with practical and illustrative examples. As an ELITech employee you are expected to adhere to the company's values and comply with these rules and guidelines.

On behalf of ELITech, I thank you for your support and commitment.



Christoph Gauer
ELITechGroup CEO

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1. Introduction and Scope

The purpose of this Code of Conduct (the “Code”) is to establish a common framework for ELITech’s culture of integrity and business values in its day-to-day operations, applicable to all the Group’s entities.

This Code sets forth the values, principles and guidelines that govern the actions of ELITech and its employees. All employees and others parties acting on behalf of ELITech must comply and make decisions in accordance with the values, principles and guidelines set out in this Code. When this Code is using the term employee, it shall be understood to also include officers, directors and everyone who act on behalf of ELITech worldwide.

Local laws and regulations, as well as local ELITech policies, may vary and be more stringent to those outlined in this Code. If a conflict arises, the stricter law, regulation or policy prevails.

In addition, ELITech wishes to work with business partners who share its values. The effective application by its business partners of the principles and rules set forth in this Code is an element that must guide everyone at ELITech for the choice of initiating and pursuing any business relationship.

All ELITech employees are requested to carefully read this Code of Conduct and periodically review it. Updates and training will also be provided.

2. Core Values and Commitments

Integrity, Quality and Innovation are our core values. ELITech is committed to applying these values and observing high ethical, quality and social standards in all areas of its business:

- Providing high-quality and market-leading products and services for professionals and patients;
- Promoting loyal commercial relationships with our business partners;
- Carrying out our business operations with integrity and honesty; and
- Protecting our people and our communities.

3. Our Products and Services

Our mission is to improve patient care by developing market-leading diagnostic products that enable health professionals to more rapidly and accurately determine the course of treatment.

ELITech endeavors to maintain the highest level of quality throughout its business, from the sourcing of materials and the manufacturing of our products, to the marketing and selling of our products and services.

Product defects reported by clients shall be internally reported by ELITech employees to their management who will escalate the concern to the proper channel, for appropriate remediation measures to be taken.

When preparing a tender, ELITech must ensure that no technical requirement is missing. Participating in a tender while a technical requirement is absent could constitute a criminal offence with direct consequences for the company.

Best Practices

- **Ensure the highest level of quality at all times of our products and services.**
- **Ensure all business partners adhere to our high-quality standards.**
- **Report and escalate any issues with products and services as per the report procedure set forth in Section 7(a).**

4. Our Partners

a. Business Partners

Our business partners play an important role in our development and success. ELITech expects high standards of performance and integrity from all of its business partners, including distributors, suppliers, agents and all other third parties. Business partners must therefore comply with all applicable laws and regulations, as well as the values and principles of the Group, set out in this Code.

Before entering into any engagement, ELITech performs due diligence of all business partners to ensure their credibility, integrity, quality and suitability, and continues monitoring them throughout the engagement. If an ELITech employee has any doubt regarding due diligence to be performed before entering into an agreement with a business partner, further advice should be sought from the local finance manager.

b. Interactions with Healthcare Professionals

ELITech is committed to supporting health systems globally and values its relationships with healthcare professionals. Healthcare professionals are key partners to ELITech's mission and help us to a better understanding of the needs of the healthcare community and in the development of our products.

Healthcare professionals are governed by strict laws and regulations in many countries and can be considered as government officials. All interactions and business relationships with healthcare professionals must be fully transparent and unbiased. Accordingly, employees should never seek to improperly influence health professionals by giving or promising something of value.

We are required under the laws of certain countries to disclose any payment or transfer of values to healthcare professionals.

It is important to maintain transparency of our relationships and of any incentives given to healthcare professionals, as well as clear and accurate reporting of payments made for consulting services or other activities that might influence purchases, approvals and registration of products.

Best Practices

- **Carry out full due diligence of all business partners.**
- **Never seek to improperly influence health professionals.**
- **If in any doubt, please raise it to your management.**

5. Our Business Operations

a. Anti-Bribery and Corruption

ELITech has a zero-tolerance policy towards all corrupt business behaviors, such as bribery and corruption, influence peddling, embezzlement, fraud, facilitation payments and granting of improper advantages.

Corruption is an act whereby a person solicits, offers, accepts or gives a gift, offers or promises to carry out, obstructs or abstains from carrying out an act pertaining directly or indirectly to their function.

Influence peddling is similar to the corruption offence, however, the person does not have the power to perform the corrupt act, but only acts as an intermediary, using influence to obtain the performance of the corrupt act from the relevant third party.

An improper advantage is a consideration of any kind, including but not limited to payments, meals, gifts, entertainment, travel expenses.

Facilitation payments are the act of paying a public official, directly or indirectly, to facilitate or expedite the performance of routine administrative formalities.

Many countries have strict laws and regulations regarding corruption offences which may result in both civil and criminal actions with severe penalties for ELITech, its representatives and the individuals involved.

All employees must therefore ensure that they do not participate in, or allow, any form of bribery and corruption.

It is prohibited to promise, offer, give or provide, directly or indirectly, a bribe or any corrupt payment, to anyone – including any government official or private person – to improperly influence any act or decision to obtain or retain business, or to secure any improper advantage for ELITech, under any circumstances.

It is also prohibited to receive or accept a bribe or any other corrupt payment.

These prohibitions apply worldwide, without exception and without regard to regional customs, local practices or competitive conditions. They also apply to any third party acting on behalf of ELITech. When selecting third parties, employees must then perform proper diligence to ensure that such third parties are committed to ELITech zero-tolerance policy towards corruption behaviours.

Best Practices

- **Business should always be conducted in good faith and transparently.**
- **Do not participate in, tolerate or support any form of corrupt business behaviors.**
- **Identify risky situations where the corruption risk is high, including high risk countries, use of third parties, and solicitations to speed up processes.**
- **All issues should be reported following the procedure set out in the ELITech's internal alert system.**

b. Gifts and Entertainment

ELITech is committed to only accepting or giving gifts and entertainment that will not raise concerns about the integrity of the Group or its employees.

Whilst common in certain business cultures and potentially acceptable if reasonable and proportionate, providing gifts, entertainment or hospitality may violate anti-corruption laws or local industry laws and regulations. This is especially the case in the healthcare sector. In certain countries applicable laws prohibit or restrict the provision of gifts and entertainments.

If not prohibited by applicable laws, it is therefore ELITech's policy that gifts may only be given or accepted where customary and reasonable, in terms of nature, frequency and value, in the country concerned and as a courtesy or token of regard and must not be conditioned to unfairly influence a business decision. Entertainment and hospitality must be directly related to a legitimate business activity involving individuals with a genuine need to be present, and conducted at an appropriate venue and location. ELITech employees shall not accept or offer gifts and entertainment to public officials.

All expenses incurred and gifts received must be accurately reported and recorded.

Best Practices

- **Do not accept or offer gifts or entertainment that go against ELITech's policy and ensure that all gifts accepted or offered comply with local industry laws and regulations.**
- **Record and report all gifts received.**
- **If in any doubt, please raise it to your management**

c. Anti-Money Laundering

ELITech prohibits any direct or indirect participation in money laundering operations. Money laundering is the process of disguising the origin of funds related to criminal activities such as corruption, drug trafficking or terrorism.

ELITech only wishes to carry out business with partners with a solid reputation and endeavors to verify the origin of funds in all transactions carried out by the Group. No payment should be accepted in risky situations, such as transfers of funds from bank accounts of third parties.

ELITech therefore requests that all employees be extremely attentive to the way payments are made, by carrying out sufficient diligence and requesting supporting documentation, in order to detect any irregular situations or suspicious behavior. Any irregularities detected shall be investigated and reported following the procedure set out in the ELITech's internal alert system

Best Practices

- **Identify risky situations, including suspicious or unusually complex transactions.**
- **Carry out full diligence and request supporting documentation for the transaction.**
- **If in any doubt, report issues following the procedure set out in the ELITech's internal alert system.**

d. Fair Competition

Healthy and fair competition is one of the essential conditions of the global economy. ELITech wishes to operate in this global economy with integrity and in compliance with national and transnational competition rules. Compliance with competition rules is in everyone's interest to promote and encourage innovation, ensure the quality and integrity of our products and create a relationship of trust and healthy competition with our customers, suppliers and other business partners.

ELITech ensures its compliance with competition laws and rules in all countries in which it operates. In particular, any exchange of sensitive information (prices, volumes and strategic planning) with a competitor is strictly prohibited. Any agreement on prices with one or several competitors on a small or large scale is also strictly prohibited, as well as any practice to distort competition. ELITech's business partners are selected on the basis of objective criteria such as quality, reliability, price competitiveness and behavior.

Failure to comply with competition rules exposes both ELITech and its employees to potential enforcement proceedings by governing regulatory authorities, which can result in large civil fines as well as potential criminal prosecution. Any incident should be reported following the procedure set out in the ELITech's internal alert system.

Best Practices

- **Consider potential competition implications for new business transactions.**
- **For tender processes, comply with all applicable tender law regulations.**
- **If in any doubt, please raise it to your management.**

e. Customs and Economic Sanctions

ELITech is an international group conducting business in more than 100 countries and is subject to multiple customs, trade and economic sanctions regulations, including sanctions by the U.S. Department of Treasury's Office of Foreign Assets Control and the European Union's restrictive measures. ELITech is committed to complying with all applicable customs, trade and economic sanctions.

International sanctions target countries and can impose comprehensive trade prohibitions, which block all trade with a company, entity or national of the sanctioned country, and partial trade prohibitions, which impose trade restrictions on specific activities with such companies, entities or nationals.

International sanctions can also target specific listed individuals or entities. These individuals and entities can be located anywhere in the world and can include front companies, parastatal entities, and individuals owned or controlled by, or acting for or on behalf of targeted countries or groups, as well as specifically identified individuals such as terrorists or narcotics traffickers.

It is important to remember that the geographical scope of certain international sanctions laws is extremely large, especially when applying to nationals of certain countries. Most international sanctions laws apply depending on where the individual is physically located. However, certain sanctions laws apply to nationals wherever they are located, even if they live and work outside the sanction-issuing country.

Sanctions can also apply to indirect activities and prohibit assisting third-parties from conducting business with a target. Any individual subject to such sanctions should not authorize, negotiate, approve, finance or otherwise assist another individual in carrying out a transaction with a target.

Failure to comply with international sanctions exposes both ELITech and its employees to potential enforcement proceedings by governing regulatory authorities, which can result in large civil fines as well as potential criminal prosecution.

Due to the nature of ELITech's products, certain products may be eligible for licenses (general, specific, export) or license exceptions in certain sanctioned countries. However, because of the ever-evolving and complex nature of these licenses, as well as international sanctions in general, ensuring strict compliance can be challenging.

Therefore, before entering into a transaction, employees are required to carry out due diligence and obtain all the necessary information about the countries and party/parties involved in order to determine the level of sanctions risk. Where any of the direct or indirect parties involved in the transaction have links or are likely to be linked to a sanctioned country, local finance manager's prior authorization must be obtained for each transaction.

Best Practices

- **Ensure full compliance with customs regulations and that all licenses and permissions have been obtained prior to shipping products.**
- **Carry out due diligence on all third parties to identify the level of sanctions risk.**
- **If the transaction has links or is likely linked to a sanctioned country, entity or individual, seek prior authorization from your local finance manager.**
- **Be vigilant on transactions and payment arrangements involving sanctioned countries.**
- **If in any doubt, please raise it to your management.**

f. Financial Integrity and Record Keeping

ELITech's accounting documents must accurately and fairly reflect its business transactions in sufficient detail and in accordance with applicable accounting laws, regulations and practices. The accuracy and completeness of books and records is essential to making informed decisions and to ensure accountability to ELITech's stakeholders and to governing regulators.

Within the Group, every employee must contribute to ensure that company books, records, and accounts accurately, fairly and timely reflect business dealings.

Falsification of or misrepresentation in any company, client or third-party record is prohibited. Likewise, mistakes should never be hidden, but should be immediately and fully disclosed within ELITech and when required by law regulation or industry standard, to regulatory organizations. Mistakes should be promptly corrected and corrective action taken as necessary.

All accounting documents, including documents of violations, must be preserved in accordance with applicable laws. All errors must be reported following the procedure set out in the ELITech's internal alert system.

Best Practices

- **Records must accurately reflect all transactions.**
- **Always provide correct and complete information with supporting documentation.**
- **All payments and transactions must be properly authorized in accordance with operating procedures and accurately recorded.**
- **If in any doubt, please raise it to your management.**

g. Conflicts of Interest

ELITech is committed to making business decisions based on merits and preventing conflicts of interest situations. ELITech is aware that employees may be confronted with situations in which their personal interests may conflict with those of the company.

ELITech encourages its employees to be vigilant in situations where the objectivity of their professional decisions could be altered. No employee may unduly exploit or appear to exploit their position at ELITech for personal gain or for the benefit of relatives or friends. In addition, certain outside professional engagements or employment may also result in conflict of interest situations.

Employees are required to disclose any potential or actual conflict of interest situations as per the report procedure set forth in Section 7(a).

Best Practices

- **Avoid situations that could appear to interfere or conflict with ELITech's interests.**
- **Do not use your position at ELITech for personal gain or for the benefit of relatives or friends.**

- **Disclose any conflict of interest situation to your management, in order to find an appropriate solution.**

h. Protection and Appropriate Use of Company Assets

ELITech and its employees are responsible for protecting and appropriately using all company assets. In addition to protecting ELITech's physical assets, such as equipment, facilities and vehicles, this protection also applies to the company's intangible assets.

i. Confidentiality of Information and Sensitive Data

All of ELITech's confidential information must be protected. Confidential information is a valuable asset for the company and plays an essential role in the continued growth of ELITech. Confidential information may include information such as financial results, information regarding patients, customers, suppliers or competitors, pricing rates, employee data, IT data and passwords, business plans and intellectual property.

All employees who have access to confidential information must preserve its confidentiality and must not use or disclose confidential information unless and only to the extent such use and disclosure is part of their duties at ELITech or where they have obtained specific written authorization to use or disclose it. Confidential information shall only be used for its intended purpose and shared on a need-to-know basis.

This protection also applies to the intellectual property rights of ELITech and its business partners. Employees have the obligation to protect the intellectual property rights of ELITech as well as the intellectual property of others.

ii. Personal Data Protection

ELITech respects the privacy of its employees, patients and business partners and is committed to protecting all personal data of its employees and business partners.

The access, use and processing, transmission and disposal of such personal data should always be carried out in a safe and secure way and in accordance with applicable data privacy laws and regulations in force in the countries where ELITech operates.

ELITech employees should report immediately any fact that could constitute a privacy breach following the procedure set out in the ELITech's internal alert system.

Best Practices

- **Only share confidential information with authorized persons on a need to know basis for business purposes.**
- **Do not discuss company business in public areas.**
- **Collect, use and store data in compliance with applicable laws.**

i. Insider Trading

ELITech is committed to preventing insider trading and the improper use of insider information, including non-public information about other companies such as customers, business partners, and suppliers.

Insider information is any non-public and material information relating directly to an issuer or a financial instrument, and if made public, would be likely to have a significant effect on the price of the financial instrument.

Any employee who has knowledge of insider information during the performance of their professional duties must keep this information strictly confidential and abstain from (i) using such information, by purchasing or selling financial instruments to which it relates; (ii) conveying such information to any third party outside the normal course of their work or professional duties, or for purposes other than for which such information has been communicated to them; and (iii) recommending to any third party to purchase or sell financial instruments on the basis of such information.

6. Our People and Communities

Pursuant to ELITech's Corporate Social Responsibility ("CSR") policy, the Group is committed to fulfilling its responsibility of care by identifying any negative consequences its business operations may have directly or indirectly on its business environment in order to prevent or mitigate them.

a. Equality and Diversity

ELITech deeply believes that social and cultural differences are an indispensable strength for the success of an internationally focused business. The history of the Group and its development is based on the professionalism and entrepreneurial spirit of our teams, who work in a stimulating, creative and non-discriminatory environment.

Within ELITech, no form of harassment or intimidation will be tolerated, whether sexual, physical, psychological or other.

No form of discrimination will be tolerated either on the grounds of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, color, nationality, ethnic or national origin, religion or belief, gender, or sexual orientation (*i.e.* protected characteristics).

ELITech is committed to fair and equal opportunities for all employees and candidates, regardless of their level of qualification, in terms of recruitment, access to training, remuneration, social protection, internal mobility and career development. The Group seeks to provide its employees with conditions conducive to their personal and professional development and to the achievement of their objectives.

ELITech implements the necessary means to promote and develop constructive relations with trade unions and employee representatives in all countries where the Group operates.

Best Practices

- **Value diversity and inclusion in the workplace.**
- **Do not discriminate anyone or engage in any form of workplace harassment.**
- **Report any incidents or misbehavior immediately following the procedure set out in the ELITech's internal alert system.**

b. Health, Safety and Environment

ELITech is committed to providing safe, secure and healthy workplaces for all its employees and integrates these considerations into its daily operations. All operations are conducted in compliance with locally applicable health and safety regulations and standards

Any potential safety hazards, even minor, should be reported following the procedure set out in the ELITech's internal alert system in order for appropriate steps to be taken.

ELITech's commitment to advancing health includes being good stewards of the environment. The Group strives to carry out business using the best technologies available with the lowest environmental impact, preserving the environment and complying with all environmental safety requirements.

ELITech has initiated projects to support environmental efforts and move towards a conscientious and sustainable business.

Best Practices

- **Considerations on health, safety and the environment should be integrated into daily business operations.**
- **Report any incidents or non-compliance immediately following the procedure set out in the ELITech's internal alert system.**

c. Human Rights

Respecting and protecting human rights are fundamental values for ELITech, who is committed to protecting its employees and ensuring compliance with all applicable rules and international standards by its employees and business partners. This includes regulations and standards relating to social security, working hours and conditions, compensation, forced and child labor and the exercise of freedom of association.

ELITech acknowledges and adheres to the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, as well as the Fundamental Principles and Rights of Work of the International Labor Organization.

Any fact that could constitute a violation of human rights should be reported immediately following the procedure set out in the ELITech's internal alert system, and the matter investigated.

Best Practices

- **Considerations on human rights should be integrated into daily business operations.**
- **Carry out due diligence on business partners, especially in countries where standards on human rights may differ.**
- **Report any incidents or non-compliance immediately following the procedure set out in the ELITech's internal alert system.**

d. Sponsoring, Donations and Political Contributions

ELITech is committed to supporting projects and companies that it believes in and determines new initiatives on a yearly basis.

Donations and sponsorship are permitted and even encouraged in certain areas, subject to applicable local laws and regulations, to situations where conflicts of interest may arise, and to not being carried out for the purpose of obtaining an improper advantage likely to constitute corrupt practices.

However, ELITech prohibits any political contributions or the support of projects whose main purpose is to disseminate political or religious information or ideas.

Best Practices

- **Donations and sponsorship initiatives shall be carried out pursuant to the Group's CSR policy and applicable local laws and regulations.**
- **Ensure legitimacy and traceability of all initiatives.**
- **All political contributions are strictly prohibited.**

7. Seeking Guidance and Reporting Concerns

a. Where to Seek Guidance and Report Concerns

ELITech fosters a culture of open communication and if any employee has a question, concern or is in need of help or advice on any area covered by this Code, they may contact their supervisor.

In addition, any employee who believes in good faith that a law, regulation or principle set forth in this Code has been or is likely to be violated may report it :

- to his direct manager or any member of his management team;
- to HR department; or
- using ELITech's internal alert system.

b. ELITech's Internal Alert System

ELITech's internal alert system is available to and can be used by all employees subject to applicable rules.

ELITech does not tolerate any form of retaliation against an employee who raises a concern in good faith. ELITech recalls and emphasizes that no employee can be sanctioned or discriminated against for having reported a violation, as long as they acted in good faith and without intent to harm, even if the facts that were the subject of the alert turn out to be inaccurate or if no action is taken.

8. Disciplinary Action

ELITech is committed to handling misconduct and breaches adequately by investigating allegations efficiently and in a timely manner to assess the facts objectively and impartially and take adequate corrective measures and sanctions.

Any breach of this Code of Conduct may be subject to disciplinary proceedings and sanctions, where applicable, in accordance with ELITech's rules and in compliance with local regulations.