

A photograph of two young boys on an outdoor basketball court. The boy on the left is wearing a dark blue jacket, glasses, and is seated in a blue and black wheelchair. The boy on the right is wearing a grey hoodie with 'BRKLN' on it, blue jeans, and is holding a basketball. They are standing on a blue textured court surface with white lines. In the background, there is a black metal fence and large green trees.

Code of Conduct

Etac's Code of Conduct sets out the standards of professional conduct that is expected in our interactions with people and the environment around us. The Code supports us in ethical dilemmas and outlines who to contact when a question or concern arises.

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Introduction

Since 1973, we have been committed to improving people's quality of life. Our assistive devices and patient handling equipment are developed to support individuals, families, and caregivers - throughout the day, and throughout the years. However, caring for our users' well-being extends beyond innovation. In our purpose of enhancing quality of life, we embrace a broader responsibility - a commitment to each other, our partners, and the environment.

Climate change is rapidly affecting our planet, and we need to reduce our environmental impact to safeguard a prosperous future for ourselves and generations to come. Equally important, we need to act responsibly and ensure sound business practices and healthcare ethics.

Our Code of Conduct reflects our long-standing dedication to improving people's quality of life and I expect everyone within Etac to follow our Code of Conduct in every aspect of our business. Together, we can go beyond our shared purpose and create possibilities for a sustainable Etac - and a sustainable world.



A handwritten signature in black ink, which appears to read 'Michael Wirzberger'. The signature is fluid and cursive, written over a thin horizontal line.

Michael Wirzberger
Group CEO

Etac's Code of Conduct was revised and established by Etac's Board of Directors on 2023-12-14 and may only be amended with approval of the Board of Directors. Michael Wirzberger, Group CEO, is ultimately responsible for implementation and compliance of the Code of Conduct.

Purpose and scope

Etac's Code of Conduct (the Code) sets out the standards of the professional conduct that is expected in our interactions with people and the environment around us. The Code supports us in ethical dilemmas and outlines who to contact when a question or concern arises. We also have local employee information (e.g., handbooks) that address local practices and policies, but it should never supersede or contradict the overarching Code.

The Code sets the minimum requirements and therefore if any local, national, or international laws or regulations take a stricter position on topics contained in the Code, they shall be observed and complied with. In the event of any conflict between laws or regulations and the Code, the provision imposing the stricter requirement shall take precedence.

Who does it apply to?

The Code applies to everyone within Etac, from the Board of Directors to all employees worldwide, and this includes part-time, contract and temporary employees.

Etac also has a Supplier Code of Conduct that covers the responsibilities of our suppliers.

What is expected of us?

Everyone is expected to understand the Code, its policies and how we should behave as representatives of Etac and act accordingly. If you do not understand the Code, have questions, or are unsure of how to handle a situation, it is important that you ask your manager or HR. And if you are a manager, lead by example, help your team to understand the Code and hold them accountable for their behaviour.

What if the Code is breached?

Failing to comply with the Code can lead to disciplinary actions, including termination of employment. If you are in a situation that you believe may violate or lead to violation of the Code, please follow the guidance on page 26.

How to report a concern?

We encourage employees and all other stakeholders to report on matters that might not be in line with the law, our organisational values, or our Code of Conduct, and that may affect the operations and reputation of Etac. Examples of violations could include fraud, corruption, discrimination, harassment, environmental crimes, and safety deficiencies.

If you know of any violations and/or have any concerns, please contact a manager in our organisation or report anonymously through our whistleblowing service.

How do we protect whistleblowers?

Your voice matters and by speaking up, you are contributing to a better company and society. We do not tolerate any form of retaliation¹⁾ or adverse consequences against anyone for engaging in reporting of wrongdoings. Everyone should feel comfortable raising concerns.

For employees and stakeholders that still feel worried of reporting directly to a manager, we offer a whistleblowing service. The whistleblowing service is provided by an external partner to ensure anonymity. The communication channel is encrypted and password-protected. All messages are processed confidentially and the person sending the message also remains anonymous in the subsequent dialogue with the whistleblowing team that consists of the Group Chief Executive Officer (CEO), Group Chief Financial Officer (CFO) and Group Human Resources (HR). To safeguard the system, all reported messages are also reviewed by our audit committee, which among others include the Chairman of the Board and our external auditor.

1) Retaliation can have different forms, some examples are termination, reduction of salary or benefits, changes in the work schedule, transfers and denial of a promotion or a raise.

Do you have any concerns about Etac's business?

We encourage employees and all other stakeholders to report on matters that might not be in line with the law, our organisational values or our Code of Conduct, and that may affect the operations and reputation of Etac.

If you know of any violations and/or have any concerns, please contact a manager in our organisation or report anonymously through our whistleblowing service.



<https://report.whistleb.com/en/etac>

Foundation of the Code of Conduct

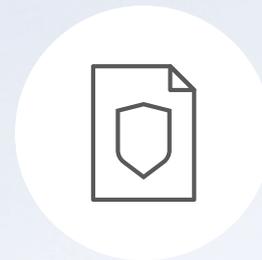
Our Code reflects our ambition to improve quality of life and is based on our three sustainability commitments:



**We care
for people**



**We care for
the environment**



**We act
responsibly**

The Code is guided by global standards and agreements, such as:

- The United Nations Agenda 2030 (17 Sustainable Development Goals)
- The United Nations Guiding Principles
- The International Bill of Human Rights¹⁾
- The United Nations Convention on the Rights of the Child
- The International Labour Organization Standards
- The OECD Guidelines for Multinational Enterprises
- The United Nations Convention against Corruption
- The Paris Agreement adopted at the UN Climate Change Conference (COP21)

We are also committed to meet all applicable local laws, regulations, and rules in each of the countries where we operate.

¹⁾ Includes the Universal Declaration of Human Rights (UDHR), the International Covenant on Economic Social and Cultural Rights (ICESCR), and the International Covenant on Civil and Political Rights (ICCPR).

We care for people

At Etac we care for people in everything we do. To us this means that we care for everyone in our ecosystem: employees, users, customers as well as our business partners.



Employees

We recognise and value the pivotal role that our employees play in our organisation. Their collective experience, knowledge and skills are the driving force behind our success.

Human rights

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination. *(As per definition by the United Nations)*

Etac's principles	What does it mean for you? (selected example)
<ul style="list-style-type: none">We honour the principles of internationally recognised human rights and respect the OECD Guidelines for Multi-national Enterprises on Responsible Business Conduct, the International Bill of Human Rights¹, and the International Labour Organization (ILO) Standards.We have zero tolerance for any violation of human rights, including modern slavery.	<ul style="list-style-type: none">You respect everyone's human rights and report any potential suspicion of violation.

1) Includes the Universal Declaration of Human Rights (UDHR), the International Covenant on Economic Social and Cultural Rights (ICESCR), and the International Covenant on Civil and Political Rights (ICCPR).

Forced labour

Forced labour is all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. *(As per definition by the ILO)*

Etac's principles

- We comply with all applicable laws and international standards regarding forced labour.
- We have zero tolerance for forced labour.

What does it mean for you? (selected example)

- You report any potential suspicion of forced labour.



Occupational health, safety and well-being

Occupational health and safety is about promoting and maintaining highest degree of physical, mental and social well-being of employees by providing a safe work environment and preventing accidents. *(Based on definition by the WHO)*

Etac's principles

- We follow all applicable local health and safety laws, regulations and standards and provide a work environment that promotes health, safety, and well-being.
- We foster a culture of health and safety among our employees and everyone working with us.
- We ensure that all employees receive the right information, regular training, and protective equipment to perform their tasks safely.
- We regularly review potential workplace hazards to improve our safety performance.

What does it mean for you? (selected examples)

- You receive regular training and information about the risks connected with the tasks you perform.
- You are accountable for always adhering to health and safety rules and practices, whether you are at the office, visiting partners or travelling.
- You take personal responsibility to ensure a healthy and safe work environment for you and your colleagues.
- You are responsible for reporting unsafe or hazardous equipment, practices, or conditions as well as accidents and injuries to continuously improve our safety performance.

For more information: Local employee information (e.g., handbook).

Fair employment conditions

Fair employment conditions mean that employees receive fair compensation, recognition for their contributions and are treated with respect for their employment rights.

Etac's principles

- We ensure that every employee receives upfront information about the place of work, description of the work to be executed, working time, total remuneration and leave entitlements.
- We apply and respect local laws about working hours and conditions.
- We ensure the right to fair and reasonable wages according to local regulations.
- We recognise and respect our employees' freedom of association.

What does it mean for you? (selected examples)

- You have the assurance that your working hours and conditions will be in accordance with local laws.
- You have the right and responsibility to report a concern if you become aware of unfair employment conditions.

For more information: Local employee information (e.g., handbook).

Children's rights

Children's rights include but are not limited to the right to healthcare, education, family life, opportunities for play and recreation, an adequate standard of living and protection from abuse and harm. All children's rights are equally important and interconnected.

Etac's principles

- We respect children's rights.
- We maintain a strict zero tolerance policy towards any form of child labour¹⁾, even in cases where local laws and regulations do not prohibit it.

What does it mean for you? (selected examples)

- You never engage with any companies using child labour.
- You report any potential suspicion of child labour.

1) Child labour refers to work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that: is mentally, physically, socially or morally dangerous and harmful to children; and/or interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work. Source: International Labour Organization (<https://www.ilo.org/ipec/facts/lang-en/index.htm>)

Diversity and inclusion

Diversity relates to all the elements that make individuals unique, including but not limited to sex, gender, gender identity and/or gender expression, national origin, ancestry, color, ethnicity, race, religion or other religious creed/beliefs, medical condition, disability, genetic information, sexual orientation, pregnancy, childbirth, breastfeeding or related medical conditions, marital status, military or veteran status, and age. Inclusion means that all individuals are treated fairly and respectfully and receive equal opportunities and fair treatment.

Etac's principles	What does it mean for you? (selected examples)
<ul style="list-style-type: none">We recognize and celebrate the differences that make up our community and are committed to creating an inclusive atmosphere where every individual feels valued, heard, and empowered to contribute with their unique insights and talents.We have zero tolerance for any discrimination, disrespectful behaviour, bullying, or harassment.We treat all employees with dignity and respect.We provide equal opportunities to all applicants and employees, regardless of their membership in any protected class, including but not limited to examples above.	<ul style="list-style-type: none">You are expected to treat your colleagues in a respectful way.You should be treated with respect, and we encourage you to report if you see any wrongdoing or feel mistreated.You should receive the same opportunities as your colleagues that have the same qualification and experience.



Personal development

Personal development is a continuous process of learning, growing, and improving skills and capabilities. Employees with the desire to learn new skills and expand their expertise within their role should have the right to do so.

Etac's principles	What does it mean for you? (selected examples)
<ul style="list-style-type: none">We value the development of our employees.We offer training and development opportunities to help our employees develop relevant skills and advance their careers.	<ul style="list-style-type: none">You are an active part of your own development and should actively seek new skills and knowledge for your role.You have the right to personal development discussions with your manager.

Users

We care for our users and have a fundamental responsibility to provide safe and effective products to our customers and users. We apply high standards in designing, developing, manufacturing, and selling our products.



Rights

Rights can be described as legal, ethical, or social principles of freedom or entitlement.

Etac's principles	What does it mean for you? (selected examples)
<ul style="list-style-type: none">• We respect the rights of our customers and users.• We have zero tolerance for any violation of human rights and children's rights.• We have zero tolerance for any discrimination, disrespectful behaviour, bullying, or harassment and we treat all customers and users with dignity and respect.	<ul style="list-style-type: none">• You respect everyone's rights and report any potential suspicion of violation.• You treat customers and users in a respectful and professional manner and do not discriminate against anyone.

Innovation

Innovation is about implementing new ideas and/or using new technologies to create value and in our case improve quality of life for individuals, family members and caregivers.

Etac's principles

- We are committed to fostering a culture of creativity, continuous learning, and innovation.
- We innovate based on the needs of our users and customers.
- We conduct our product development in an ethical and responsible way.

What does it mean for you? (selected examples)

- You are encouraged to present new ideas and challenge the status quo.
- You develop products and solutions in an ethical and responsible manner.



Safety, quality, and regulatory excellence

Safety, quality, and regulatory excellence is about ensuring the safety of people using our products and complying with applicable laws and regulations.

Etac's principles

- We focus on providing safe products with high and consistent quality and with the lowest possible risk for users, and provide adequate instructions and warnings for consumers to use them safely.
- We continuously ensure that our products comply with the strict regulations that apply to medical devices in any of the markets where our products are sold.
- We systematically evaluate our services for improved quality, functionality, and performance in compliance with regulatory requirements to maintain product safety and efficiency throughout the complete lifecycle.

What does it mean for you? (selected examples)

- You ensure high quality when developing, manufacturing, and commercialising our products.
- You comply with applicable safety and quality regulations and report if you become aware of any potential misconduct.

Partners

We strive to do business with partners whose environmental, social, and ethical standards are in line with ours and use our standards to evaluate whether to enter or continue relationships with potential or existing partners.



Business partners

Business partners encompass stakeholders that we purchase goods and services from, sell products or services to, and/or collaborate with.

Etac's principles

- We carefully select our business partners and continuously review their performance and conduct.
- We strive to only do business with partners that share our values.

What does it mean for you? (selected examples)

- You follow all company policies and procedures when evaluating a new business partner.
- You only engage with business partners that comply with our Supplier Code of Conduct.

For more information: Supplier Code of Conduct.

We care for the environment

At Etac we are committed to protecting the environment. We work to reduce the environmental impact from our own business and across the value chain.



Climate change

We recognise the importance of the Paris Agreement and the Precautionary Principle and understand our responsibility to reduce our environmental and climate impact. We work actively to improve our environmental performance by minimising the impact of our products and operations.

Climate change mitigation

Climate change mitigation refers to efforts to reduce or prevent the emission of greenhouse gases. Mitigation can mean using new technologies and renewable energy sources, making older equipment more energy efficient, or changing management practices or consumer behaviour. (As per definition by the United Nations)

Etac's principles

- We comply with all environmental laws and regulations in every country we operate in.
- We strive to minimise our environmental impact.
- We regularly monitor and transparently report on efforts for continuous improvement.

What does it mean for you? (selected examples)

- You make sure to understand the environmental risks and impacts that are associated with your daily work and strive to minimise your environmental impact.
- You follow environmental rules and regulations.

Climate change adaptation

Climate change adaptation refers to adjustments in response to actual or expected climate changes. It can be changes in processes, practices, and structures to moderate potential damages or to benefit from opportunities associated with climate change. *(Based on definition by the United Nations Climate Change)*

Etac's principles

- We keep ourselves informed and continuously assess the effects of climate change, both risks and opportunities.
- We adapt and develop contingency plans for the relevant areas of our business.

What does it mean for you? (selected examples)

- You inform your manager if you know of any business risks and/or opportunities related to climate change.
- You follow contingency plans and instructions.

Energy efficiency

Energy efficiency means using less energy for the same output or producing more with the same energy input, and minimising energy waste. *(As per definition by the European Environment Agency)*

Etac's principles

- We continuously measure our energy consumption.
- We strive to improve our energy efficiency in new and existing operations.

What does it mean for you? (selected example)

- You make sure to not use more energy than needed to perform your tasks.

Renewable energy

Renewable energy is energy that comes from natural sources that are produced at a higher rate than they are consumed. Sunlight and wind, for example, are such sources that are constantly being produced. Fossil fuels, such as coal, oil and gas, are on the other hand non-renewable resources that take hundreds of millions of years to form. *(Based on definition by the United Nations Climate Action)*

Etac's principles

- We evaluate renewable energy sources for our existing and new activities and operations.
- We strive for 100% renewable energy sources.

What does it mean for you? (selected example)

- You follow guidelines and when possible, evaluate and use renewable energy sources.

Resource use and circularity

We strive to advance in circularity through product development, sustainable material selections and collaboration models, and ensure responsible waste management practices.



Product development

Product development is the process of transforming an idea into a new product or improving an already existing product.

Etac's principles

- We recognise the importance of a circular economy and our responsibility to contribute to it.
- We incorporate circular design principles in our product development to enable reuse, refurbishment, remanufacturing and/or recycling of our products.

What does it mean for you? (selected examples)

- You do your best to foster circularity.
- You incorporate circular principles when designing products and related solutions.

Resource use

Resource use relates to appropriation and use of resources, ecosystems and naturally occurring materials such as soil, wood, water, and minerals. (As per definition by the European Environment Information and Observation Network)

Etac's principles

- We strive to minimize resource use in our products and operations.
- We strive to replace primary raw material (virgin) with secondary materials (non-virgin) to the extent possible*.
- We also strive to use renewable and recyclable material to the extent possible*.

What does it mean for you? (selected examples)

- You make sure to not use more resources than needed to perform your tasks.
- You follow internal guidelines on material selection when purchasing resources.

* As a medical device company, the safety of our users is always our number one priority and non-virgin, renewable and/or recyclable material should not be used when they do not meet our quality and/or industry requirements. Type of material should also be weighted in relation to supplier aspects such as location, emissions and social responsibility to ensure a comprehensive and fair sustainability assessment.

Circular business and collaboration models

Circular business and collaboration models can be described as opportunities where we create value of circularity for the environment, us and/or our partner(s).

Etac's principles

- We recognize the importance of circularity for the environment, but also see it as an opportunity to create business value.
- We strive to increase and expand our circular business and collaboration models, such as refurbishing, take-back programs, and remanufacturing concepts.
- We follow all applicable laws and rules that relate to circularity of medical devices.

What does it mean for you? (selected examples)

- You are encouraged to identify and present opportunities for circular collaboration models.
- You follow applicable laws, rules and guidelines that relate to circular processes of medical devices.

Waste

Waste can be defined as unwanted or unusable material, substances, or by-products from our operations.

Etac's principles

- We strive to minimize waste through mindful consumption, reuse, and recycling.
- We follow laws and regulations on waste management.

What does it mean for you? (selected examples)

- You make sure to not generate more waste than needed to perform your tasks.
- You follow laws, regulations, and internal guidelines for management of waste and report if you become aware of any potential misconduct.

Pollution

We strive to minimize the environmental impact of our operations and follow laws, regulations and procedures regarding pollution and harmful substances.



Pollution of air, water and soil

Pollution of air, water and soil can be described as direct and indirect introduction of emissions which may be harmful to human health or the environment or result in damage to material property and amenities. *(Based on definition by the European Union's Industrial Emissions Directive)*

Etac's principles

- We comply with all environmental laws and regulations in every country we operate in.
- We continuously strive to minimise our environmental impact.

What does it mean for you? (selected examples)

- You follow environmental laws, regulations, and procedures to avoid pollution.
- You report if you become aware of any form of pollution.

Harmful substances

Harmful substances can be defined as substances that are of concern or of very high concern for human health and/or the environment. It could for example be dangerous chemicals.

Etac's principles

- We follow laws, regulations, and procedures regarding harmful substances.
- We strive to conduct regular follow-ups on chemicals in our products.

What does it mean for you? (selected examples)

- You follow laws, regulations, and procedures regarding harmful substances.
- You report if you become aware of any harmful substances in our operations and/or products.

We act responsibly

At Etac we act responsibly and comply with applicable laws and regulations. As a medical device manufacturer, we also apply healthcare ethics in our daily business.



Compliance and business ethics

We conduct business with integrity and honesty as well as with respect of laws and guidelines such as the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the European Union Competition Law and the Antitrust Laws in the US.

Fair competition

Competition and antitrust laws protect and promote free and fair competition. Antitrust laws prohibit agreements between market operators that would restrict competition, and the abuse of dominance. Competition encourages companies to offer consumers goods and services at the most favourable terms. *(Based on definitions by the European Commission)*

Etac's principles

- We act in accordance with fair and free competition principles in all parts of our business and raise awareness about applicable competition and anti-trust laws and regulations.
- We do not engage in any illegal activities.

What does it mean for you? (selected examples)

- You compete fairly and do not seek competitive advantages through illegal business practices.
- You do not engage in price fixing with competitors or suppliers.
- You report any suspicious transactions or activity.

Corruption and bribery

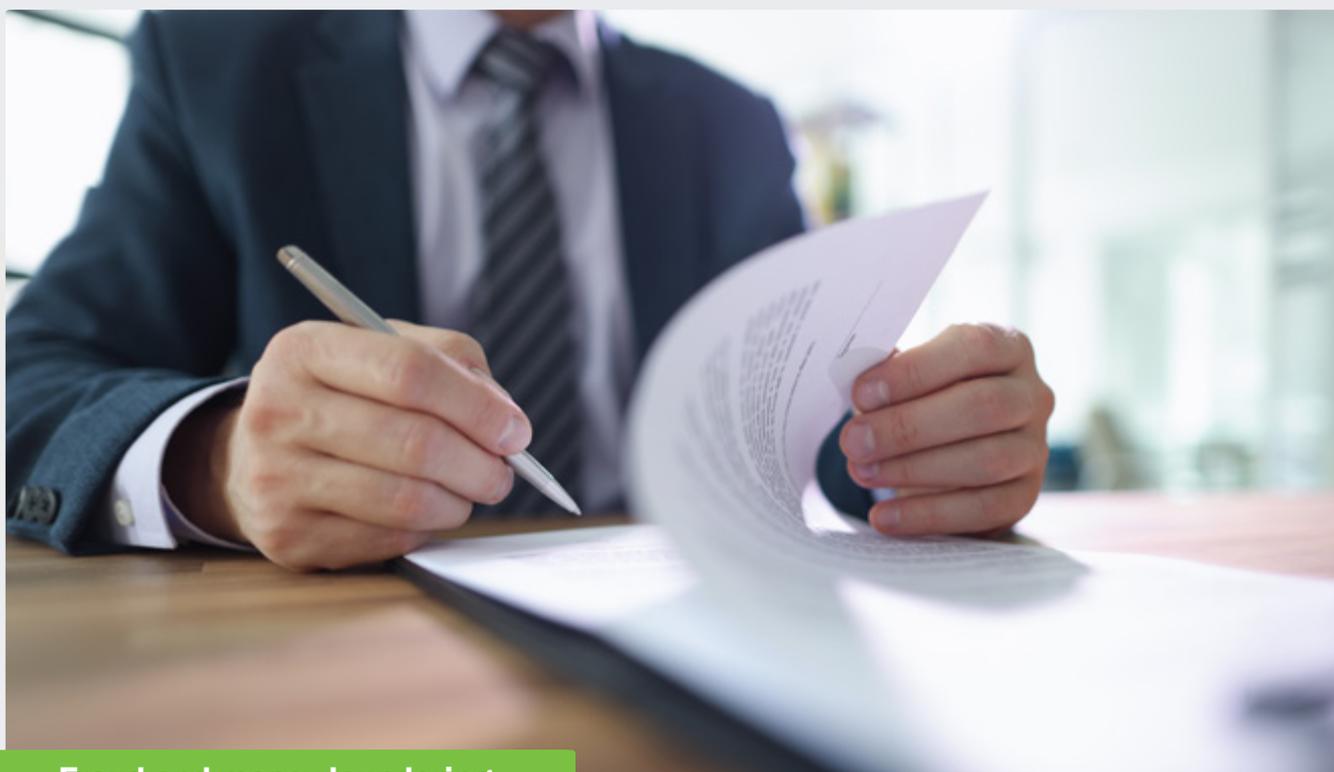
Corruption is the act of offering, promising, or giving any improper financial or other advantage to public officials or employees with which the enterprise has a business relationship. Bribery is a type of corruption which is limited to the giving or acceptance of payment of other illegal advantages.

Etac's principles

- We comply with all local and international anti-corruption laws, regulations, standards, policies, and procedures.
- We forbid any form of bribery, fraud, corruption or provision of inappropriate payments or other benefits.
- We promote awareness of compliance with enterprise policies and internal controls among employees.

What does it mean for you? (selected examples)

- You do not provide meals, gifts, travel, entertainment or other similar remuneration or consideration to customers without making sure it satisfies all regulations and guidelines, which might differ from country to country.
- You do not accept meals, gifts, travel, entertainment or other similar remuneration or consideration from partners without making sure it satisfies all regulations and guidelines, which might differ from country to country.
- You report any suspicious transactions or activity.



Fraud and money laundering

Fraud can be described as deliberate deception to obtain unfair or unlawful gain, and money laundering is a process of taking money that has been generated by illegal activities and make them appear to have come from a legitimate source.

Etac's principles

- We comply with all local and international laws and regulations regarding fraud and money laundering.
- We forbid any form of fraud and money laundering.

What does it mean for you? (selected examples)

- You follow laws and regulations.
- You report any suspicious transactions or activity.

Conflicts of interest

A conflict of interest can be described as when someone's personal interests, e.g., related to family, friends, financial, or social aspects, could bias his/her judgement, decision-making and/or actions in the company.

Etac's principles

- We make decisions based on the best interest of Etac, and do not allow conflicts of interests unless they have been approved in writing by the Group CEO.
- We separate professional and political interests, and do not provide financial or other support to political parties or campaigns.
- If a conflict with the interests of the company is believed to exist, the affected employee(s) and/or board member(s) are excluded from offering input, voting, or otherwise affecting decisions related to that conflict.

What does it mean for you? (selected examples)

- You do not allow personal or private interests to influence your work.
- You do not engage in any work that is in competition with Etac and/or is related to our suppliers or customers.
- You inform your manager if a potential conflict of interest exists or may appear to exist.

Trade restrictions

A trade restriction is a restraint on trade of products and/or services between two or more countries. Examples of trade restrictions include trade sanctions and embargoes.

Etac's principles

- We comply with all trade restrictions that are applicable to our business.
- We provide accurate and honest information to customs and other relevant authorities.

What does it mean for you? (selected examples)

- You comply with all relevant trade restrictions.
- You report any suspicious transactions or activity.

Record keeping

Record keeping refers to management of business-related records and ensuring that they always are complete, updated, and accurate.

Etac's principles

- We follow relevant laws, regulations and guidelines for record keeping and storing.
- We ensure that our records related to business activities are complete, updated, and accurate.

What does it mean for you? (selected example)

- You follow laws, regulations and internal guidelines when creating documentation and ensure to safely store and retain company records in compliance with relevant retention policies.

Healthcare ethics

We ensure that all interactions with Healthcare Professionals (HCP), Healthcare Organisations (HCO), patients and patient organisations (PO) are ethical and professional at all times. In our interaction with HCPs, HCOs and POs we respect applicable laws, regulations and guidelines.



Healthcare professionals and healthcare organisations

A healthcare professional (HCP) is any person that is a member of the medical, dental, pharmacy or nursing professions or any other person who may prescribe medical products. Healthcare organisations (HCOs) are organisations designed to deliver healthcare services by HCPs.

Etac's principles

- We ensure that the interactions with HCPs and HCOs are guided by the highest standards of integrity.
- We only engage with HCPs when there is a legitimate business need and in our role of providing reimbursement services or advice to HCPs, we never encourage inappropriate reimbursement for our products.
- We never use bribes, kickbacks, or other similar remuneration or consideration to any person or organisation in order to attract or influence business activity.
- We prohibit all gifts, except small items such as pens, measuring tapes and allen keys to any HCP. We also prohibit entertainment. Meals, consulting fees, product training and discounts may only be provided in those areas that are not prohibited by local law and should be appropriately documented.
- We document any transfers of value to HCPs in excess of local minimum thresholds.
- We never mislead HCPs and only promote our products based on evidenced and approved claims.

What does it mean for you? (selected examples)

- You do not offer services, compensation or similar remuneration or consideration to HCPs or HCOs in order to attract or influence business activity.
- You do not accept to pay more than the appropriate market value for a service provided by HCPs or HCOs.
- You never make a direct (personal) payment, including reimbursement of legitimate expenses, to an HCP or HCO. Payments should always be made through the company's accounts payable process.
- You are truthful, never misleading, and only promote our products based on evidenced and approved claims.
- You report any potential misconduct.

Patients and patient organisations

Patient organisations (POs) are non-profit legal entities that represent or support the needs of patients, which are users of our products.

Etac's principles

- We comply with applicable laws for interactions with patients and POs.
- We serve all patients in the same way and have zero tolerance for any type of discrimination.

What does it mean for you? (selected examples)

- You comply with applicable laws and company policies for interactions with patients and POs, and do not give any gifts or similar to influence patients or POs.
- You treat patients in a respectful and professional manner and do not discriminate against anyone.
- You are truthful, never misleading, and only promote our products based on evidenced and approved claims.
- You report any potential misconduct.

Clinical evaluation and product marketing

Clinical evaluation means a systematic and planned process to continuously generate, collect, analyse, and assess the clinical data pertaining to a device to verify the safety and performance, including clinical benefits of the device. Product marketing is the material designed to support safe use of and promote the devices. *(Based on definition by The European Union Medical Device Regulation)*

Etac's principles

- We comply with applicable regulations, rules, and standards when conducting clinical evaluations.
- We conduct clinical evaluation as part of the device design and development phase.
- We record, interpret, and report clinical and scientific data and results with honesty and integrity.
- We comply with applicable regulations and guidelines when developing product marketing material and only promote our devices based on evidence and approved claims.
- We encourage our customers to provide assessment and feedback of our products, translated into case studies and testimonials.

What does it mean for you? (selected examples)

- You follow regulations, rules, standards, and internal procedures and guidelines when conducting and supporting clinical evaluation and truthfully report clinical findings without fear of reprisal or retribution.
- You follow regulations, guidelines and internal procedures when developing marketing material and only promote our devices based on evidence and approved claims.
- You report any potential misconduct.

Data protection

We follow applicable laws and regulations and protect the data and information that we produce and receive to ensure the safety and integrity of our company, employees, customers, users, and partners.



Data protection and cyber security

Data protection consists of measures and rules to safeguard data such as personal information, intellectual property, and confidential information. Cyber security is the practice of defending a system from malicious attacks, aiming to protect sensitive information and maintain the system integrity.

Etac's principles

- We follow applicable laws and regulations for personal data protection and only collect, process, store and/or transfer personal data to the extent that we have a lawful and specific need for the information.
- We protect our intellectual property and confidential information, such as business strategies, technical know-how, financial information, customer lists and passwords, from unauthorised disclosure.
- We respect and protect others' intellectual property and confidential information and only use it if we have obtained permission to do so.
- We work proactively to ensure that all employees receive information and training about data protection and cyber security, and technically limit the risk of cyber security breaches.

What does it mean for you? (selected examples)

- You follow laws and regulations and only collect, process, store and/or transfer personal data if you have a lawful and specific need for the information.
- You store personal data securely and do not retain it longer than necessary. You do not share sensitive, personal, confidential, proprietary information in an unsafe format or channel.
- You follow our cyber security user policy and are responsible for reporting potential risks of data and cyber security breaches as well as actual breaches.

For more information: Cyber Security User Policy.

Communication

We are committed to being a transparent company and to communicate in an open, accurate and timely manner, while respecting legal and business obligations.



External communication

External communication refers to any form of communication that originates from Etac Group and is directed towards external stakeholders. External stakeholders can include but are not limited to media and press, general public, HCPs, HCOs, patients, POs, and regulatory bodies.

Etac's principles	What does it mean for you? (selected examples)
<ul style="list-style-type: none">• We manage media enquiries through the Group CEO and CFO, or other representatives appointed by them.• We behave professionally in our business communication and ensure that it meets high standards.• We act responsibly in social media and follow company policy and guidelines.	<ul style="list-style-type: none">• You forward media requests to the Group Chief Marketing Officer (CMO), and only speak on behalf of the company if you have been appointed by the Group CEO or CFO.• You understand your role as a representative of the company, and act professionally in business communication and social media.

For more information: Social Media Policy.

Guidance for decision-making

If you find yourself in an ethical dilemma and are unsure of how to proceed, then stop and ask yourself the following questions:

- Do I understand the risks and implications?
 - Is it legal and in compliance with regulations?
 - Does it comply with our Code of Conduct and policies?
 - Would I feel comfortable if I had to explain my actions to my manager or a colleague?
 - Could I defend my actions if they appeared in public media?
-

If your answer is “No” to any of the above questions, then do not do it. The action might have serious consequences for you and the company. If you are unsure, ask for guidance from your manager or a senior leader.

Have you already committed the action or feel pressured to do so? Please contact your manager or another senior leader or report anonymously through our whistleblowing service.

Contact information

Directors and Executive Officers

- Chairman of the Board - Nora F. Larssen: nora.larssen@nordstjernan.se
- Group CEO - Michael Wirzberger: michael.wirzberger@etac.com
- Group CFO - Niklas Axelsson: niklas.axelsson@etac.com

Media requests

- Group CMO - Sanna Lennartsson: sanna.lennartsson@etac.com

Other representatives

- VP of Quality Assurance & Regulatory Affairs - Kim Ankjaer: kim.ankjaer@etac.com
- Human Resources
- The employee's immediate supervisor

This contact list is subject to change from time to time. Any change to this contact list shall not be deemed as an amendment to this Code.

Do you have any concerns about Etac's business?

We encourage employees and all other stakeholders to report on matters that might not be in line with the law, our organisational values or our Code of Conduct, and that may affect the operations and reputation of Etac.

If you know of any violations and/or have any concerns, please contact a manager in our organisation or report anonymously through our whistleblowing service.



<https://report.whistleb.com/en/etac>

The whistleblowing service is provided by an external partner to ensure anonymity. The communication channel is encrypted and password-protected. All messages are processed confidentially and the person sending the message also remains anonymous in the subsequent dialogue with the whistleblowing team that consists of Group CEO, Group CFO and Group HR. To safeguard the system, all reported messages are also reviewed by our audit committee, which among others include the Chairman of the Board and our external auditor. For frequently asked questions, please visit: <https://whistleb.com/whistleblowing-system/FAQs/>



Etac

 sustainability@etac.com

 www.etac.com

 **etac**[®]
Creating Possibilities

Etac_Code of Conduct_EGC 6.2-002-F_EN02
