Code of Ethics and Business Conduct

I. Introduction

The purpose of the creation and implementation of this Code of Ethics is to set out the core values and principles that guide us to ensure that our actions comply with applicable law, the extra-legal requirements we have identified, and generally accepted and applied ethical principles.

Acting in accordance with the principles described in this document is expected to result in strengthening the perception of Famed Zywiec as reliable and trustworthy and caring for both internal and external relations with its immediate environment.

This "Code of Ethics and Business Conduct" of Famed Zywiec outlines the company's rules and practices regarding compliance with the law and business ethics. It reflects the company's high ethical standards and fundamental values. Although the Code does not take into account all possible situations that one may encounter in business, it offers general guidelines on the company's expectations of the behaviour of employees and its representatives and their ethical and legal responsibility as representatives of Famed Zywiec. Each member of the Management Board, Supervisory Board and also each employee of Famed Zywiec Sp. z o.o. is obliged to familiarise themselves with this code and to comply with the rules and principles contained therein during and in relation to any action taken on behalf of the Company.

We expect our employees, members of bodies and representatives to comply with the letter and spirit of the law and to scrupulously observe business ethics in the performance of their duties. The Code applies to all departments and divisions as well as subsidiaries. In case of doubt, employees are obliged to refer to their immediate superiors. In the event of any discrepancy between the principles contained in the code and certain local customs, the principles contained in the code shall prevail.

We hope that our values are the same as those of our customers and all those with whom the Company conducts business. We expect individuals and organisations outside the Company's structures to respect our principles as expressed in the Code and to co-operate in accordance with the guidelines indicated in the Code to ensure that relationships based on integrity, honesty and mutual respect are maintained.

In case of any doubts concerning the interpretation of the provisions of this Code, we encourage you to contact us via e-mail: etykahr@famed.com.pl

II. Our core ethical values are respect, responsibility, compliance with the law and customer care.

The most important values that we uphold in our relations both inside and outside Famed Zywiec are:

A. Respect

Respect is the key value that guides our actions, both in contacts between employees, between employees and Company bodies, and between Famed Zywiec representatives and customers and suppliers.

We act with respect for ethical principles and strive to eliminate discrimination and favouritism towards individuals or entities. It is important to us that there is no corruption in the actions of our employees and representatives. We insist that the relationships we create are based on clear principles, transparency and respect for the diversity of the people involved. We support each other's knowledge and experience in our employee relations.

B. Responsibility (for actions, products and services offered)

As a manufacturer of medical devices, we feel socially responsible and committed to meeting the expectations of the users of our equipment to provide them with products that are safe, proven, based on the best solutions and from verified suppliers. To ensure that we offer products of the right quality and user satisfaction, we have implemented a quality management system at Famed Zywiec that meets the requirements of EN ISO 13485 - Medical devices - Quality management systems and EN ISO 9001 - Quality management systems, and whose main objective is to ensure that high standards are maintained, in particular in the area of compliance with the requirements of Regulation (EU) 2017/745 of the European Parliament and of the Council of 5 April 2017 on medical devices, amending Directive 2001/83/EC, Regulation (EC) No 178/2002 and Regulation (EC) No 1223/2009 and repealing Council Directives 90/385/EEC and 93/42/EEC (hereinafter MDR). The Company's employees are required to follow the procedures established as part of the Quality Management System. This is monitored on an ongoing basis in all areas of the Quality Management System. We have a friendly customer service policy and have set high standards within the organisation relating to building and maintaining customer relationships. We thoroughly inspect our suppliers and their range of products covered by purchasing plans for compliance with the applicable laws in force, particularly in the area of required regulatory compliance with the MDR.

C. Respect for the law

It is imperative that our employees and representatives act in accordance with the applicable laws and regulations applicable to each area of our business. We ensure that our employees and representatives have adequate knowledge of the applicable laws, identify them and require that our partners, particularly suppliers, comply with the requirements indicated in the relevant legal acts. We assume that compliance with legal requirements is not sufficient, which is why we implement the standards outlined in this Code in addition to the legal and contractual requirements we have entered into. We verify compliance with legal or contractual requirements at some of our suppliers by, among other things, conducting audits and monitoring the implementation of the recommendations made as a result of the audit.

D. Taking care of customer satisfaction

At Famed Zywiec Sp. z o.o., we care about customer satisfaction by providing professional customer service, but also in a broader perspective - we make sure that the medical devices we manufacture and distribute are verified in terms of having correct and complete documentation and operational safety, and that our suppliers are reliable. We require our suppliers to meet the quality and ethical requirements and standards we set, in addition to and independent of legal requirements. With a view to adapting to our customers' needs, we strive to understand their needs and take an individual approach to them through flexible measures.

We are open to new challenges, which is why we accept the changes taking place in our environment and adapt to them, seeing them as opportunities for our development, while at the same time

looking for non-standard solutions to improve our way of working - taking care of the welfare of the recipients of our products and services.

III. Rules of conduct within the internal organisational structure.

A. We respect and support each other in our daily professional challenges

Each employee can count on the support of their immediate supervisor and the Company's managers to provide advice and assistance in accordance with the Company's established system and policies. We respect the diversity of views of different people and serve each other's experience and knowledge for the benefit of the entire organisation. We seek to resolve any disputes through dialogue by formulating arguments while respecting the views of others and maintaining a culture of expression

Not only do we act to prevent discrimination against our employees, but we also thoroughly consider every potential case of behaviour that could be described as such. Employees are obliged to respect each other's rights and freedoms, irrespective of age, background, values or any other aspect of the employee's life. Employees are not entitled to abuse their power or influence in any way and to use their advantage to the detriment of other colleagues or the Company. It is unacceptable for an employee's personal interest to contradict the interests of the Company, and actions in the private sphere must therefore be taken in such a way that they do not affect the operation of the Company. Cooperation and teamwork is one of the basic prerequisites for the proper functioning of the Company.

As part of implementing our values, we are introducing a Diversity, Equality, and Inclusion Policy as a mechanism to promote diversity and prevent exclusion. The policy is attached as Appendix 1 to this Code.

B. We are open-minded, we adapt to the changing world and its needs, and focus on development

We constantly analyse the surroundings and look for ways to develop, and when there is a need for change, we adapt to the situation and look for opportunities to use new skills in a specific action. We look for non-standard ideas to improve our operation. We take on challenges, celebrating the success of the whole team and taking responsibility for the consequences of the risks we take. We communicate our professional needs to our superiors and collaborate with them to find solutions to satisfy legitimate requests, aiming to enhance our qualifications, improve our operations, develop our skills and broaden our knowledge, striving to act for the good of the Company, our customers and the entire immediate environment.

C. We protect restricted information even if we are not sure if it constitutes a business secret

The day-to-day operations of the Company generate huge volumes of documents and information, including information that is confidential, restricted or not at all accessible to the public. Due to the type of relationships we maintain with many entities representing different regions of the world, we also possess information provided by our partners that requires special protection.

Accordingly, each employee of the Company has access only to documents that are necessary for their daily work and is obliged to distribute documents or information only in accordance with the status and distribution capabilities of the document or information in question and, in case of doubt,

to seek advice from their superior or the relevant Company department. These actions are taken irrespective of the requirements imposed on us to protect the business secrets of our partners.

Employees must ensure that only authorised persons have access to documents relating to their work, e.g. it is forbidden to leave in publicly accessible areas without securing them against unauthorised access any documents containing sensitive data, prices, confidential information, information relating to the structure, finances, suppliers and customers, etc. which are relevant to the Company's operations and which it can be established are not generally accessible outside the Company as part of official communications generated by the Company and our partners.

D. We ensure that important aspects of the Company are documented

In order to ensure transparency in our operations and to be able to verify the correctness of the Company's performance in specific aspects of our operations, we require the development of documentation for critical activities. This obligation is reflected in the procedures that make up the Quality Management System implemented at Famed Zywiec and the closely related obligations that it imposes on us as an MDR medical device manufacturer, and what is more, this obligation extends to all aspects of the Company's employees' activities that are important for the operation and perception of us as a reliable organisation. The actions taken by the Company's employees are monitored and the actions taken as part of the procedures in the Company's Quality Management System are audited as planned.

E. We take care of the entrusted infrastructure elements necessary for the work

In order to perform their work effectively, we ensure that employees have access to work tools appropriate to their position and assigned responsibilities. Employees are obliged to take care of the technical condition of the equipment entrusted to them, to protect it against loss, to limit the access of third parties to the data contained on the equipment, to use the equipment and tools entrusted to them for their intended purpose. Employees are obliged to use the company e-mail in a reasonable manner, maintaining the culture of speech, presenting professionalism in business relations and are responsible for the content they share.

IV. Rules of conduct for external business relationships, i.e. outside the Company's structure

A. Representation of the Company

Employees of the Company are obliged to keep confidential the aspects related to the functioning of the Company, including in particular technical, technological, organisational information, but also other information relevant to the proper functioning of the organisation. When acting outside the Company, including business relations, meetings and trips, employees must act in a manner that does not adversely affect the good name of the organisation. When taking private actions in the public sphere, employees should not invoke their relationship with the Company. Employees should not speak in public on matters relating to the operation of the Company without due authority. Employees must respect the work of other Company employees and refrain from making public statements, particularly negative ones, about the work of colleagues and from disseminating information that is untrue, unsupported by official communications produced by the Company or unproven.

B. Corruption

Corruption is not tolerated in our Company. We have no tolerance for corruption in our Company. In order to counteract the possibility of the Company being exposed to loss or damage to its reputation, we have introduced policies relating to situations where potentially corrupt activities may occur, in particular:

- Business meetings

Business meetings may take place both on and off the Company's premises. The meeting shall respect the values of the guest, including identified cultural differences. A superior may refuse to authorise a meeting if they have doubts that the meeting is held for the purpose of building or strengthening business relationships in a manner consistent with the Company's professed principles, including compliance with this Code.

The rules described above also apply to trips sponsored by external entities, i.e. an employee's participation in a trip is allowed only if it is closely related to building or strengthening an existing business relationship in a way that ensures the transparency of that relationship, must be justified from the point of view of the Company's business profile or be of a promotional nature for the Company.

It is unacceptable for an employee or a representative of the Company to participate in a trip where the circumstances indicate that the trip organiser expects reciprocity or to take certain actions on behalf of the Company for the benefit of the trip organiser.

- Accepting and giving gifts

Employees and representatives of the Companies are required not to accept gifts when it is apparent from the circumstances that the person/organisation giving the gift expects reciprocity or to take certain actions on behalf of the Company for the benefit of the giver of the gift.

Employees and representatives of the Companies may only offer gifts after agreeing with their supervisor on this and the type, value and circumstances of the gift.

It is permitted to accept and give small gifts, especially gifts of a promotional nature for the Company or the giver (marketing articles with the logo of the Company or its partners or the giver) and occasional gifts (flowers, food).

It is forbidden for the Company's employees to accept or give cash, but also vouchers, prepaid cards, gift cards - the value of the benefit given is irrelevant. It is also forbidden for Company employees to accept or give tickets for cultural or sporting events.

Employees are obliged to inform their supervisor of the fact that they have received a gift that does not meet the requirements described above by describing and indicating the approximate value of the gift or by presenting it. Gifts intended for employees and not meeting the above-mentioned rules are to be forwarded to the Company Secretary's Office with a request to return the gift to the giver.

- Contact with representatives of the competent supervisory authorities

Contact between designated and authorised employees and representatives of the market surveillance authorities should only take place via company e-mail, company telephone or by means of paper correspondence between the Company and the supervisory authority.

For the sake of transparency in the relationship, in the event of a conflict of interest in the relationship with the supervisor of the employee concerned, the employee is obliged to inform their immediate superior of this fact. The supervisor decides on further contact with the surveillance authority.

The principle of transparency of activities and integrity applies. Employees are obliged to exercise due diligence in providing information to the authorities. It is unacceptable to give representatives of the surveillance authority any gifts or to behave in any other way that damages the good name of the Company, including any action that could be perceived as an attempt to influence the decisions of the authority concerned.

Substantive discussion with representatives of the authority is permitted in accordance with the applicable legislation.

C. Fair competition

We act in accordance with the law and therefore also in accordance with the principles of fair competition as expressed in the relevant laws. At the same time, we expect our partners to also respect the applicable laws, contractual obligations, non-contractual obligations entered into voluntarily, e.g. under accepted codes of good practice, internally imposed and communicated as well as generally recognised practices, including commercial/buying practices.

D. Customer relations

Customer satisfaction is our driving force for further commitment and development, which is why we attach great importance to ensuring that the customer not only receives a good quality medical device, but also an appropriate after-sales service. We serve customers who are businesses and professionals in the area of further sales and use of medical devices and other products from our range. Regardless of the type of relationship we treat everyone equally, honouring the commitments we have made.

We strive to ensure that the information we provide on the products in our portfolio is not misleading, that it is clear and legible and that our marketing activities are carried out in compliance with applicable laws and regulations.

We take care to ensure that our statements are not misleading.

V. Procedure to be followed in the event of violations of the rules contained in the Code

In the event of any violation of the rules contained herein, or if any doubts arise as to the classification of a given behaviour as a violation of the rules set out above, any person may submit an enquiry to the following e-mail address: **etykahr@famed.com.pl**.

Employees and representatives of the Company who have ascertained a breach of the rules of the Code or have doubts in this respect are obliged to report it personally to the Company's Management Board or to the e-mail address **etykahr@famed.com.pl**, indicating the circumstances of

the case and participating in the investigation conducted by the Company's Management Board or the persons appointed by the Management Board.

As a minimum, each report should indicate the following:

- ✓ The description of the behaviour constituting or potentially qualifying as a breach of the rules described in this Code of Ethics.
- ✓ The date or, if in doubt, the approximate date or period during which the breach of the Code occurred.
- ✓ The indication of the persons who are or may be involved in the violation of the Code.

Investigations into the circumstances indicated in the reports are carried out by the Company or by persons designated by the Management Board, protecting the identity of the reporting person and maintaining impartiality and due diligence in explaining the circumstances of the case. The Company does not tolerate any form of aggression towards persons reporting violations of the Code.

In the event that the person concerned by the report is a member of the Management Board of the Company concerned, the Supervisory Board shall investigate the circumstances indicated in the reports. The principles set out above shall apply accordingly.

The Management Board/designated person shall first analyse the content of the report and, if necessary, clarify it with the reporting person if it is possible to identify the reporting person. Next, the Management Board/designated person conducts an investigation by gathering the information or evidence necessary to clarify the matter. If a violation is found, the Management Board (or in relevant cases the Supervisory Board) decides on the consequences of the violation for the employee or representative who violates the Code.

Until a violation by an employee or representative has been unequivocally confirmed, that person's data shall be protected. This ensures that any potential negative consequences for a person wrongly accused of violating the Code are avoided. This principle is only compromised in cases specified by applicable laws.

All employees and representatives of the Company have a duty to cooperate in clarifying the circumstances of the case by promptly responding to requests from the Management Board/designated person and by providing relevant documents/information/other evidence relevant to the clarification of the case.

VI. Regulations

The provisions of this Code shall remain in force until revoked or amended in accordance with the relevant decisions of the Management Board.
The provisions of this Code shall enter into force upon approval by the Management Board.
The provisions of this Code shall be applied and interpreted in the context of all the Company's regulations, which together constituteAhe Compliance System.

Attachments:
- Attachment No. 1 - Diversity, equality, and inclusion policy.

President of the Board, CEO Marek Suczyk
Vice President, CFO Paweł Tomala

Diversity, Equality and Inclusion Policy

This Policy is an internal guidance document, outlining strategic priorities and processes for integrating diversity, equality and inclusion perspectives throughout the company. This policy is part of the Company's compliance system and should be read and interpreted in connection with the Company's other policies and applicable laws.

We take care of:

Diversity is the collective mixture of differences and similarities that includes individual and organizational characteristics, values, beliefs, experiences, backgrounds, preferences, and behaviors. We honor and value diversity because it strengthens the company and fosters innovation and creativity, which improves performance. A diverse work environment enhances inclusivity and the feeling of belonging of our staff.

Equality reflects our commitment to providing consistent and systematic fair and impartial treatment for all employees. We commit to challenging biases that limit equality within our company and ensuring that all employees are educated about the resources available to them in support of their goals and success.

Inclusion is the achievement of a work environment in which all individuals are treated fairly and respectfully, have equal access to opportunities and resources, and can contribute fully to the organization's success. Without inclusive practices, a diverse environment cannot be achieved

We are focusing on:

Famed Żywiec Sp. z o.o. strictly adheres to international and applicable local laws on human rights and freedoms and ensures equality before the applicable local laws for all employees. A special focus is placed on the identification and elimination of any kind of employee discrimination on any grounds whatsoever. Any kind of discrimination on any ground such as race, colour, language, age, sex, citizenship, origin, place of birth, place of residence, social or property status, profession, religion or belief, nationality, ethnicity or social belonging, family/marital status, health, disabilities, sexual orientation, gender identity and expression, political opinion or other beliefs is prohibited.

Discrimination refers to direct or indirect violation of someone's dignity aimed at or resulting in an intimidating, hostile, degrading, humiliating or offensive environment against him/her, or creation of conditions that directly or indirectly degrades his/her position relative to others under the same working conditions.

The Policy revolves around the equal treatment and opportunities of women and men with different background and characteristics in the workplace that means assessing the risks of discrimination, taking steps to eliminate discrimination and promote equal opportunities and inclusion.

We support:

We focus on ensuring that our actions are proportionate to achieve a legitimate goal, and that cases of employee differentiation arise from legitimate circumstances not related to the above-mentioned reasons and manifestations of discrimination.

Company is realizing that closing gender pay gaps helps to attract and retain staff, improving their performance and growth. Equal remuneration for men and women workers for work of equal value refers to rates of remuneration established without discrimination based on sex. Equal remuneration for work of equal value is a principle aiming to achieve fairness in pay between women and men. It is different from "equal pay for equal work", as it seeks to address the fact that women and men tend to perform different jobs, often with different levels of pay.

When men and women perform work that is different in content, involving different responsibilities, requiring different skills or qualifications, and is performed under different conditions, but is overall of equal value, they should receive equal remuneration. This concept is critical to eliminating discrimination and promoting equality, since women and men often perform different jobs, under different conditions and even in different establishments. Women continue to be concentrated in a limited number of jobs, and jobs held predominantly by women tend to be undervalued. That is why, Company implemented a job evaluation system and systematically and regularly evaluates the content of each job critical to understanding what makes roles comparable and how equal pay can be measured.

We monitor:

Responsible HR department collect and monitor relevant indicators of the company's progress on diversity, equality, and inclusion, review this and related policies annually and provides information, advice, and assistance to managers and employees on diversity, equality, and inclusion matters.
Based on gender-responsive approaches and gender-sensitive data collection reporting on gender outcomes should be a component of all project-reporting processes. Company will regularly monitors the impact of diversity, gender equality and inclusion policies, action plans and measures to improve accountability to commitments made and ensure progress and results. We also collect reliable and measurable data to measure and monitors progress achieved in promoting diversity, gender equality and inclusion. Company conduct an analysis to assess company's strategic approach to gender equality, identify gaps and opportunities for continuous improvement, benchmark against peers and industry standards, and set goals and targets.

We act:

To enhance diversity, inclusion and gender mainstreaming through internal communication, Company is:
- communicating the relevant tasks and demands to the staff involved
- communicating on the aims and planned activities
- creating greater awareness and strengthening commitment
- using the channels and forms of communication customarily used within an organisation (formal channels, such as standing instructions, internal newsletters, team meetings, working sessions, speeches at the events).

Company conducts communication activities and disseminate information among company staff using all effective channels for internal communication

President of the Board, CEO
Marek Suczyk

Vice President, CFO
Paweł Tomala