

*This translation consists of
11 pages
Number: 477/2021
Date: 24 November 2021*

Certified translation from the Croatian language





MEDIC

Code of Ethics and Business Conduct

Introduction

The company Medic d.o.o. operates since 1991.

Our core values state that we are:

» Cooperative

« Proactive

• Reliable

We are cooperative. We have one common goal: to work as a team.

We are proactive. We take initiative to improve our work, quality, and business.

We are a reliable partner to our customers, but we also treat each other as colleagues.

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Message from the Management Board of Medic

Our business is regulated in accordance with all applicable laws and regulations concerning the business activities of our company. Statutory compliance with company guidelines and policies governs all aspects of our business.

We have to work together as a team to achieve our goals.

All company employees are responsible for compliance.

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1. Compliance Program of Medic d.o.o.

Guidelines and policies concerning appropriate business conduct.

Compliance training and the possibility to raise questions.

Audits and monitoring compliance with company laws and standards.

2. Application of the Code of Ethics and Business Conduct

This Code applies to all employees, directors, board members and contractors, and the subsidiary Medic BH d.o.o., under the ownership of the company.

Responsible persons in the company must lead by their own example to the creation of a culture of compliance.

Corrective action should be taken in the event of non-compliance with this Code.

3. Maintaining Compliance

Training

Compliance training and support in any situation are available to all employees.

The training includes all elements of the compliance program, acquaintance with this Code, and information on laws and regulations concerning the company's business.

Employees are trained according to their function.

4. Audit and Compliance Monitoring

Medic d.o.o. monitors and audits its business activities to confirm its compliance with the law, guidelines, and company policy.

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5. Consequences of a Non-Compliant Conduct

In case of violation of the law or this Code, disciplinary measures or corrective actions shall be taken.

6. Company Business

Our business depends on proper relations with suppliers and customers, which must be based on legal regulations in accordance with good distribution practices.

The selection of a supplier is our responsibility and they all offer quality products manufactured according to the highest world standards and technology, and in accordance with legal regulations.

Our responsibility is to build a relationship with customers by offering quality goods and providing premium service.

In the event of a customer complaint, it is important to react immediately and look into the adverse event.

Medic operates transparently, which is proven by proper documentation, drafted in accordance with legal regulations.

The company's business activities are compliant with all accounting and financial laws and regulations. Pursuant to the above, records are kept in paper and electronic form, and they are archived for the prescribed period of time.

Business operations with state institutions and entities are based on public tenders. Reception of goods, incoming and outgoing invoices are in accordance with regulations.

During inspections, employees responsible for the subject area shall submit all required documentation to the inspector in charge.

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7. Compliance with Anti-Corruption Laws

Medic operates in accordance with anti-corruption laws and principles. Business decisions and affairs are based on the quality of products and services.

Business partners, directly or through a third party, are not favoured by offering any value or services in order to obtain or continue the business affair.

Likewise, Medic employees do not accept or solicit any value for themselves or another person from business partners that could influence business decisions.

Examples of Prohibited Behaviour:

1. To confer any value, if its nature or value is unreasonable and inappropriate for the occasion and circumstances of the recipient:
 - it is inappropriate to give something without a clear business reason
 - frequent giving may be considered excessive
 - donation in a non-transparent manner, e.g., to a private address or bank account
2. To use next of kin to give or accept anything
3. To give or accept anything with the intent of receiving, or in anticipation of the equivalent value
4. To give or accept anything that may affect the recipient or the objectivity in the decisionmaking process

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8. Support for Scientific Conferences and Education of our Customers

We support the participation of users of our products at congresses and educational gatherings, and we organize workshops in cooperation with principals for our customers.

Donations and contributions that we offer for the meetings must be transparent and with prior approval .

9. Prevention of Money Laundering and Due-Diligence for Sub-Contractor

Medic conducts its business in accordance with Anti-Money Laundering laws and regulations.

Medic is committed to acting with integrity and dealing fairly in its business activities in the marketplace. We expect our business partners to follow the same principles of ethical business conduct, including taking appropriate actions to prevent corruption and money laundering while dealing with their partners.

It is necessary to perform an analysis of Medic's potential partner and sub-contractor assessment against bribery and money laundering for each sub-contractor engaged by Medic or another third-party business partner who intends to perform certain activities or undertakes obligations in accordance with the signed contract to perform a certain business activities for the benefit of Medic, following the recommendations and rules of the profession, before Medic will authorize a sub-contractor or other business partner.

9. Advertising and Promotion

Promotional and marketing activities are conducted in accordance with legal regulations.

Promotional material is approved and/or made by the principal, the manufacturer of the promoted products.

To promote medical devices, all promotional materials must be in accordance with the Medical devices act.

10. Communication with the Media

In case of any inquiries and communication with the media, statements are given by the members of the Management Board of Medic, or by the responsible person in charge of the subject area.

Medic guarantees open, truthful, and honest communication.

11. Political Activities

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An employee may engage in political activities personally, but must refrain from any engagement related to Medic, and may not use the company's time, property, or equipment for personal political activity.

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12. Data Privacy

Medic collects, uses, or processes personal data of its customers, suppliers, and employees in accordance with the data protection regulation.

13. Conflict of Interests

A conflict of interest occurs when a person's private interest interferes or appears to interfere in any way with Medic's interests and may also arise when the Company, employee, director, or a member of his or her family receives improper benefits because of his or her position within Medic. These situations include, but are not limited to, relationships with government officials, health care professionals, health care organizations, physician owned companies, or any other situation where it may appear that company decisions can be influenced by personal interests or relationships. You should avoid a conflict, or an appearance of a conflict, between your personal interests, your official responsibilities and your Company's interests. Any potential conflict of interest should be declared.

14. Employment

Medic endeavours to provide to its employees a safe, reliable, productive, and non-discriminatory working environment.

Protection and safety at work are Medic's highest priority.

Medic does not tolerate discrimination at work on the basis of:

- Gender
- Nationality
- Religion
- Age
- Marital status
- Sexual orientation
- Or any other unlawful discriminatory consideration.

The use of alcohol and narcotics that endanger health and safety in the workplace is not allowed.

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15. Assets of Medic

Company assets are used only for legitimate business purposes.

All documents and all information (strategic, financial, and technical) on internal business operations must be treated as confidential.

It is necessary to protect personal computers from unauthorised access.

Attention should also be paid to IT aspects of confidentiality, such as data protection and data security.

Such obligation applies during and outside working hours, as well as in the event of termination of employment at Medic unless otherwise stated in applicable law.

16. Social Media

Social media are becoming an important part of today's business.

Employees are not allowed to use social media for business activity unless they are authorised by the company or their supervisor.

Employees must not disrespect the company or spread false rumours about or against the company.

17. Intellectual Property

Intellectual property is important for the economic success of a company and needs to be protected.

1, OZANA VALENT, court interpreter for the English and Swedish language, appointed by Decree No. 4 Su- 612/2021 of 12 July 2021 by the President of the County Court in Zagreb, do hereby certify that the above translation is a faithful and complete translation of the original document written in the ~~original~~ ^{original} language.
Zagreb, 24 November 2021 Cert. No.: 477/2021



KODEKS ETIČKOG I POSLOVNOG PONAŠANJA

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Uvod

Tvrtka Medic d.o.o. posluje od 1991. godine.

Osnovne naše vrijednosti su da smo:

- Kooperativni
- Proaktivni
- Pouzdani

Kooperativni smo imamo jedan zajednički cilj i da svi radimo kao jedan tim Proaktivni smo preuzimamo inicijative kako bi poboljšali rad, kvalitetu i poslovanje Pouzdan smo partner našim kupcima, ali i međusobno jedni drugima kao kolege

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Poruka Uprave tvrtke Medic

Naše poslovanje regulirano je u skladu sa svim važećim zakonima i propisima koji se odnose na djelatnost tvrtke. Ta zakonska usklađenost sa smjernicama i politikom tvrtke vodi sve aspekte našeg poslovanja.

Moramo raditi zajedno kao tim i na taj način ostvariti zadani cilj.

Usklađenost je odgovornost svih zaposlenika tvrtke.

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1. Program usklađenosti tvrtke Medic d.o.o.

Smjernice i politika koja se odnosi na pravilno poslovanje.

Obuka o usklađenosti i mogućnost postavljanja pitanja.

Revizije i praćenje usklađenosti sa zakonima i standardima tvrtke.

2. Primjena Kodeksa etike i poslovnog ponašanja

Ovaj Kodeks se primjenjuje na sve zaposlenike, direktora, članove uprave i ugovorne djelatnike, te tvrtku kćer Medic BH d.o.o. koja je u vlasništvu.

Nadležni su dužni da svojim primjerom utječu na stvaranje kulture usklađenosti.

Potrebno je osigurati korektivne mjere u slučaju ne pridržavanja ovog Kodeksa.

3. Održavanje usklađenosti

Obuka

Obuka o usklađenosti, te pružanje podrške u bilo kojoj situaciji pruža se svim djelatnicima.

Obuhvaća sve elemente programa usklađenosti, upoznavanje sa ovim kodeksom te informacije o zakonima i propisima koji se odnose na poslovanje tvrtke.

Djelatnici prolaze obuku koja je vezana za njihovu funkciju.

4. Revizije i praćenje usklađenosti

Tvrtka Medic d.o.o. prati i revidira svoje poslovanje kako bi potvrdila da je u skladu sa zakonom, smjernicama i politikom tvrtke.

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5. Posljedice za nesukladnost

U slučaju povrede zakona ili ovog Kodeksa poduzet će se disciplinske mjere ili korektivne radnje.

6. Poslovanje tvrtke

Naše poslovanje ovisi o korektnim odnosima sa dobavljačima i kupcima koji se moraju temeljiti na zakonskim propisima u skladu sa dobrom distributerskom praksom.

Naša odgovornost je na odabiru dobavljača, te svi u ponudi imaju kvalitetne proizvode proizvedene prema vrhunskim svjetskim standardima i tehnologiji, te u skladu sa zakonskim propisima.

Naša odgovornost je i izgraditi odnos sa kupcima imajući u ponudi kvalitetnu robu i pružajući im vrhunsku uslugu.

U slučaju pritužbe kupca važno je odmah reagirati i sagledati neželjeni događaj.

Medic posluje transparentno, a dokaz je uredna pisana dokumentacija u skladu sa zakonskim propisima.

Poslovanje tvrtke je u skladu sa svim računovodstvenim i financijskim zakonima i propisima.

U skladu sa tim vode se zapisi i papirnatom i elektronskom obliku, te se čuvaju u propisanom vremenskom periodu.

Poslovanje sa državnim ustanovama i institucijama temelji se na javnim nadmetanjima.

Zaprimanje robe, ulazni, izlazni računi su u skladu sa propisima.

Prilikom inspekcijskih nadzora, djelatnici koji su zaduženi za područje koje je pod nadzorom će dostaviti svu traženu dokumentaciju nadležnom inspektor.

7. Usklađenost s antikorupcijskim zakonima

Medic posluje u skladu sa antikorupcijskim zakonima i principima.

Poslovne odluke i poslovi temelje se na na kvaliteti proizvoda i usluga.

Ne pogoduje se poslovnim partnerima, direktno ili preko treće osobe, nudeći bilo kakve vrijednosti ili usluge kako bi se dobio ili nastavio posao.

Isto tako niti djelatnici Medica ne primaju niti traže neku, vrijednost za sebe ili drugu osobu, od poslovnih partnera koja bi mogla utjecati na poslovne odluke.

Primjeri zabranjenog ponašanja:

1. Davanje bilo kakve vrijednosti, ako priroda ili vrijednost nije razumna i prikladna za tu prigodu i okolnosti primatelja:
 - neprikladno je dati nešto što nema jasan poslovni razlog
 - često darivanje se može smatrati pretjeranim
 - darivanje na netransparentan način npr. na privatnu adresu ili bankovni račun
2. Koristi stranke u srodstvu za davanje ili prihvaćanje bilo čega
3. Davanje ili prihvaćanje bilo čega s namjerom ili u očekivanju protuvrijednosti
4. Davanje ili prihvaćanje bilo čega što može utjecati na primatelja ili objektivnost u procesu donošenja odluka

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8. Podrška znanstvenim skupovima i edukaciji naših kupaca

Podržavamo sudjelovanje korisnika naših proizvoda na kongresima i edukativnim skupovima, te organiziramo radionice u suradnji sa principalima za naše kupce.

Donacije i prilozi koje dajemo za održavanje skupova moraju biti transparentni uz prdhodno odobrenje.

9. Sprečavanje pranja novca

Medic posluje u skladu sa zakonima i pravilima protiv pranja novca.

Radimo samo sa renomiranim poslovnim partnerima koji su uključeni u legitimne poslovne aktivnosti sa sredstvima dobivenim iz legitimnih izvora.

10. Oglašavanje i promocija

Promotivne i marketinške aktivnosti provode se u skladu sa zakonskim propisima.

Promotivni materijal je odobren i/ili izrađen od strane principala, proizvođača proizvoda koji se promoviraju.

Za pomoć medicinskih proizvoda svi propagandni materijali moraju biti u skladu sa zakonom o medicinskim proizvodima.

11. Komunikacija sa medijima

U slučaju bilo kakvih upita i komunikacije sa medijima izjavu će dati članovi uprave Medic ili odgovorna osoba nadležna za područje o kojem se daje informacija.

Medic jamči otvorenu, istinitu i iskrenu komunikaciju.

12. Političke aktivnosti

Zaposlenik se može baviti političkim aktivnostima osobno, ali se mora ograditi od bilo kakvog angažmana povezanog sa Medicom, te ne može koristiti vrijeme, imovinu ili opremu tvrtke za osobnu političku aktivnost.

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13. Privatnost podataka

Medic prikuplja, koristi ili obrađuje osobne podatke svojih kupaca, dobavljača i djelatnika u skladu sa uredbom o zaštiti podataka.

14. Sukobi interesa

Od zaposlenika se očekuje da djeluju u najboljem interesu za Medic, te da se ne bave u slobodno vrijeme poslovima koji su povezani sa djelatnošću Medica kako bi se izbjegao sukob interesa.

Zaposlenik ne smije koristiti imovinu, informaciju ili svoj položaj u tvrtki za ostvarenje svoje osobne koristi.

15. Zaposlenje

Medic svojim djelatnicima želi osigurati sigurno, pouzdano, produktivno i nediskriminirajuće radno okruženje.

Zaštita i sigurnost radnika je najviši prioritet Medica.

Medic ne dopušta diskriminaciju na radnom mjestu na temelju:

- Spola
- Nacionalnosti
- Vjere
- Starosne dobi
- Bračnog statusa
- Seksualne orijentacije
- Ili bilo kojeg drugog nezakonitog diskriminirajućeg razmatranja

Uporaba alkohola i opojnih droga koje ugrožavaju zdravlje i sigurnost na radnom mjestu nije dozvoljena.

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16. Imovina tvrtke Medic

Imovina tvrtke koristi se samo za legitimne poslove svrhe.

Svi dokumenti i sve informacije (strateške, financijske i tehničke) o unutarnjem poslovanju moraju se tretirati kao povjerljivi.

Potrebno je zaštititi računalo od neovlaštenog pristupa.

Potrebno je također obratiti pozornost na IT aspekte povjerljivosti kao što su zaštita podataka i sigurnost podataka.

Te obveze vrijede tijekom i van radnog vremena, kao i u slučaju prestanka radnog odnosa u Medicu, osim ako nije suprotno navedeno u važećem zakonu.

17. Društveni mediji

Postaju važan dio današnjeg poslovanja.

Zaposlenici ne smiju koristiti društvene medije za poslovne aktivnosti ako nisu ovlašteni od tvrtke ili svog nadređenog za to.

Zaposlenici ne smiju omalovažavati tvrtku ili širiti ne istinite glasine o njoj ili protiv nje.

18. Intelektualno vlasništvo

Intelektualno vlasništvo je važno za gospodarski uspjeh tvrtke i potrebno ga je zaštititi.

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