



## Global Third-Party Code of Conduct

**ONWARD Medical N.V., ONWARD Medical SA., and ONWARD Medical Inc.**, hereafter referred to as "ONWARD Medical", is firmly dedicated to operating with the highest level of integrity, ensuring compliance with all applicable laws.

We rely on our **third-party partners to adhere to the same standards of integrity, legal compliance, and alignment with our values** as we do. Third parties are any entity or individual engaged by ONWARD Medical to provide goods, services, or conduct business activities on behalf of or in connection with ONWARD Medical.

This Code of Conduct outlines the expectations and principles that must guide the conduct of third parties when conducting those business activities. All third parties are expected to adhere to the standards outlined herein. **Third Parties commit to complying with the principles and standards set forth in this Code of Conduct at the time of entering into a contractual relationship with ONWARD Medical.**



**Purpose & Scope:** This third party Code of Conduct establishes the ethical and legal standards our company expects all its engaged third-party suppliers, contractors, consultants, agents, distributors, and any other business associates (hereinafter referred to as "Third Parties") to adhere to, on a worldwide basis. ONWARD expects its suppliers to extend these standards to their own suppliers.

**Monitoring and Evaluation:** The Company may conduct periodic assessments and audits to evaluate engaged Third Parties' compliance with this Code of Conduct and may require Third Parties to provide documentation or evidence of their compliance upon request.

**Consequences of Non-Compliance:** Failure to comply with this Code of Conduct may result in termination of contracts or business relationships with Third Parties and may expose individuals or entities to legal liability, financial penalties, or reputational damage.



## Section 1. Compliance with Laws and Regulations

**Legal Compliance:** Third Parties must comply with all applicable laws, regulations, and legal requirements in the jurisdictions where they operate or conduct business activities on behalf of ONWARD Medical.

**Anti-Corruption and Bribery:** Third Parties shall not engage in any form of bribery, corruption, or unethical conduct, including offering, giving, soliciting, or accepting bribes, improper payments, or any other transfer of value, whether directly or indirectly.

**Trade Compliance:** Third Parties must adhere to all international trade laws and regulations, including sanctions, export controls, and customs requirements, and must not engage in any activities that violate trade laws or facilitate illegal trade practices.

**Data Privacy and Security:** Third Parties must handle personal and Company data in accordance with applicable data protection laws and regulations and take appropriate measures to safeguard the confidentiality, integrity, and security of data collected, processed, or transmitted in connection with their activities for the Company.

**Health and Safety Regulations:** Third Parties must ensure the health and safety of their employees, contractors, and any other individuals affected by their activities and comply with all relevant health and safety laws and regulations.



## Section 2. Ethical Business Practices

**Integrity and Fair Dealing:** Third Parties must conduct their business with integrity, honesty, and fairness, and must not engage in any deceptive, fraudulent, or unethical practices.

**Conflicts of Interest:** Third Parties must disclose any actual, perceived or potential conflicts of interest that may arise in connection with their activities for the Company and take appropriate measures to avoid or mitigate such conflicts.

**Gifts, Entertainment, and Hospitality:** Third Parties must comply with the Company's policies and guidelines regarding the offering, giving, receiving, or accepting of gifts, entertainment, and hospitality, ensuring that such practices do not influence or compromise business decisions or relationships.

**Confidentiality and Intellectual Property:** Third Parties must respect the confidentiality of information provided by the Company and its stakeholders and must not disclose or misuse confidential information or intellectual property belonging to the Company except as directed by the Company.



### Section 3. Human Rights and Labor Practices

The company explicitly requests Third Parties ensure their own suppliers adhere to the same standards outlined in this Code of Conduct and with strict observance of this section.

**On Discrimination and Diversity:** Third Parties must promote equality, diversity, and inclusion in the workplace and must not discriminate against any individual or group on the basis of race, ethnicity, gender, age, religion, disability, sexual orientation, or any other protected characteristic.

**Working hours, Forced Labor, and Child Labor:** Third Parties will ensure employees are provided with fair wages, benefits, and working conditions in compliance with applicable laws and industry standards. Third Parties will not employ children under the age of 16 and comply strictly with international conventions and related regulations.

**Freedom of Association and Collective Bargaining:** Third Parties must respect the rights of employees to freely associate and collectively bargain in accordance with applicable laws and regulations.

**Health and Safety in the Workplace:** Third Parties must provide a safe and healthy work environment for their employees, contractors, and any other individuals affected by their activities, and must comply with all relevant health and safety laws and regulations.



### Section 4. Environmental Responsibility

**Environmental Compliance:** Third Parties must comply with all environmental laws, regulations, and standards applicable to their operations and activities and must take proactive measures to minimize their environmental impact.

**Resource Conservation:** Third Parties must use natural resources efficiently and responsibly and implement measures to reduce waste, conserve energy, and promote sustainable practices.

The Company requires Third parties engaged in the design and manufacturing of products to focus on minimizing the use of raw materials and packaging. Suppliers are further encouraged to explore and adopt alternative materials with lower environmental impacts whenever feasible. By integrating these practices into their operations, suppliers contribute to the Company's commitment to environmental sustainability and reducing its ecological footprint.

**Pollution Prevention:** Third Parties must prevent pollution and minimize adverse environmental impacts arising from their activities, products, or services, including air emissions, water pollution, waste generation and impacts on biodiversity.

**Sustainable Practices:** Third Parties are encouraged to adopt environmentally sustainable practices and technologies to minimize their carbon footprint and contribute to environmental conservation efforts. Third Parties must actively avoid acquiring, trading, possessing or otherwise furthering the use of these conflict minerals.



## Section 5. Business Integrity

**Transparency and Accuracy in Reporting:** Third Parties must adhere to good accounting and reporting practices and not engage in any form of fraudulent, misleading, or deceptive practices.

**Protection of Company Assets:** Third Parties must safeguard ONWARD Medical's assets, including physical assets, intellectual property, confidential information, and proprietary technology, and must not misuse, misappropriate, or improperly disclose such assets.

**Use of Company Information and Resources:** Third Parties must use ONWARD Medical's information, resources, and facilities responsibly and solely for the purpose of fulfilling their contractual obligations to the Company and must not disclose or use confidential information for unauthorized purposes.

**Anti-Competitive Practices:** Third Parties must compete fairly and ethically in the marketplace and must not engage in anti-competitive practices such as price-fixing, bid-rigging, market allocation, or other forms of collusion.



## Section 6. Responsibilities and Reporting

**Reporting Violations or Concerns:** Third Parties must report any suspected violations of this Code of Conduct or any concerns regarding unethical or illegal conduct to the Company's designated compliance officer.

**Reporting Mechanism:** Reports must be made directly to the Company's Chief Compliance Officer, Lorenzo Fanti, at the following email address: [lorenzo.fanti@onwd.com](mailto:lorenzo.fanti@onwd.com), or to [legal@onwd.com](mailto:legal@onwd.com).

When reporting, third parties are encouraged to provide:

- Specific incidents
- Dates
- Individuals involved (if known)
- Any supporting evidence

It is the responsibility of all third parties to contribute to a culture of integrity and compliance by promptly reporting any concerns they may have.

**Investigations and Corrective Actions:** The Company shall investigate all reports of suspected violations or concerns in a prompt, thorough, and impartial manner and take appropriate corrective actions, including termination of contracts or business relationships, where necessary.

**Non-Retaliation:** ONWARD Medical prohibits retaliation against any individual who reports suspected violations of this Code of Conduct or participates in investigations of such reports in good faith.



**Section 7. Continuous Improvement:**

The Company encourage all Third Parties to be transparent, accountable and engaged in the continuous improvement of their sustainable development commitment. In that respect, the promotion of the principles and values contained in this policy with their own suppliers and partners is strongly recommended.

Review and Revision of the Code of Conduct: The Company reserves the right to review and revise this Code of Conduct periodically to ensure its effectiveness, relevance, and alignment with evolving legal, regulatory, and ethical standard.

**Contact Information**

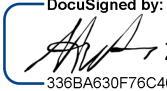
Chief Compliance Officer: **Lorenzo Fanti**

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Email Address: [legal@onwd.com](mailto:legal@onwd.com)

Postal Address: **ONWARD Medical SA** Pont Charles Bessières 3, 2e étage, 1005 Lausanne (Switzerland).

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**Signature:**  27 May 2024  
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Chief Compliance Officer: **Lorenzo Fanti**