

# Code of Conduct and Business Ethics

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## Introduction:

This Code of Conduct and Business Ethics reflects the guiding principles and rules governing the operation of KALTEQ SA and presents the commitment of the Management, as well as its requirements regarding ethical professional practices. It sets the boundaries of daily operation and behaviour between its employees, its executives and partners or third parties acting on behalf of and for its behalf, as well as those towards customers and suppliers, encouraging each of them to adopt an ethical approach and a common culture of values. The combination of the Code of Conduct and Business Ethics with the Company's Values form the basis for the development of trust, which plays a key role in our sustainable business success in the sensitive healthcare sector in which we operate.

## 1. Commitment of the Management

The Company is committed through its Management to comply with the applicable legislation, as well as the requirements of this Code and to provide a healthy, fair and safe workplace, promoting mutual trust and cooperation. It supports and applies equal opportunities and employment criteria in accordance with labour legislation, regardless of gender, nationality, colour, sexual orientation, origin or physical appearance.

We strive to maintain open lines of communication internally, so that staff members have a better understanding of the business and its mission, and contribute to maintaining its culture, as well as to its further development and growth.

## 2. Our Vision, Purpose and Values

Kalteq was founded in 2004 and since then it has been steadily making history in the medical technology sector in Greece. This success is the result of our sincere efforts to promote innovative and safe added-value technologies, with a commitment to business excellence, integrity, respect and responsibility. At KALTEQ we share a common goal, the introduction and availability of medical technologies designed to improve not only health, but also the quality of people's lives. We support innovative technologies that aim to benefit patients and the National Health System.

We focus with dedication on the needs of the medical sector and hospitals and we implement our commitment to provide stable and high-quality services of high standards, thus creating reliable partnerships.

Kalteq's **vision** is to contribute effectively to providing the best possible care to patients in hospitals and at home by facilitating, supporting and enabling the use of innovative and reliable medical technologies and pharmaceutical therapies to healthcare providers. We aspire to be trusted and skilled professionals for physicians and reliable and effective partners for medical technology solution companies, to ultimately deliver value-added services to patients and society.



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Kaltecq's **mission** is to identify and make available the most valuable and innovative medical technologies and pharmaceutical therapies to healthcare providers. Throughout this mission, we are focusing our efforts and investing time and high expertise to develop product expertise, operational excellence and trusted partnerships that will maximize our impact on the highest work of physicians and, by extension, the lives of patients.

**KALTEQ** is passionately committed to meeting the critical needs of patients and healthcare providers, improving people's lives by promoting and distributing innovative medical technologies and pharmaceutical therapies and providing unsurpassed support services.

**Our Values:**

**Development**

We are dedicated to our purpose and inspired by our vision to become better every day. We consistently evolve as a company and individually as professionals, enhancing our capabilities, learning from our experiences and passionately seeking new opportunities to be useful. We invest in talent, effort and time to build and leverage the partnerships that will fuel our shared growth, always driven by our common purpose and mission. We constantly seek excellence and innovation. Driven by our love of knowledge and our open minds, we constantly aim to make a significant and positive impact on both the health and well-being of patients and the well-being of our society.

**Responsibility**

We fully understand and greatly value our role as professionals in realizing our vision. We aim first and foremost to improve the health and quality of life of patients and respond with a strong sense of responsibility to the needs of both patients and healthcare providers.

We strive zealously to be reliable, honest and responsible partners. We face challenges with vigor and are committed to being the best, constantly delivering top-notch service. We always act with integrity and courage. Aware of our responsibility to society and the environment, we adopt and establish practices that effectively help protect and support them.

**Cooperation**

We respect, value and honour our colleagues, our partners, the healthcare professionals and the patients we work with. We communicate openly, share our expertise and ideas and aspire to be useful to all those who work with us, so that our actions add value while we evolve, learn and become better, all together.

We are committed to building the necessary foundations that encourage and promote effective partnerships with our partners and customers. We actively embrace and seek ambition in the skills and growth potential of our people, as it enhances creativity and leads to better decision making, while fostering ground-breaking business innovation.

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## Trust

Trust is the foundation of all our actions and is the most valuable asset of our Company. We earn this trust by acting with integrity and transparency, by keeping our commitments and by supporting open and honest communication in all our relationships.

We value the trust placed in us by our partners, customers and patients and are committed to acting consistently and effectively. We adopt high ethical standards and address the needs of our partners and customers with the utmost transparency, clarity and reliability.

We strongly believe in the potential of our people and create an environment with the ideal conditions for them to develop their talents and skills, thus ensuring their maximum contribution to the common vision that connects and motivates us.

## 3. Working Environment

### Compliance with legislation and evolution

Kalteq complies with labour legislation at all levels, is committed to respecting the human rights, dignity and privacy of the individual and not to benefit, even indirectly, from any form of forced or compulsory labour. We comply with applicable labour laws and do not permit involvement in child labour, forced labour or trafficking.

### Diversity - Equal opportunities

Kalteq supports the diversity and uniqueness of the workforce. We are committed to providing equal employment opportunities for all members of our staff, regardless of race, colour, religion, nationality, citizenship, gender, gender identity, sexual orientation, marital status, political opinions, pregnancy, age, disability or physical condition.

### Evaluation

The company has adopted an evaluation system for the objective and merit-based rewarding of its employees. It evaluates employee performance with a view to providing appropriate training and guidance, and assistance in developing and cultivating professional skills. By setting specific objectives, it ensures an objective way of evaluating - scoring both quantitative and qualitative behavioural objectives for all employees of the company.

### Violence and Harassment

This policy is adopted in accordance with Articles 9 & 10 of **Law 4808/2021** and the regulatory legislation pursuant thereto and covers the persons referred to in paragraph 3 of Article 3 10.

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Kalteq recognises the right of all to a work environment free from violence and harassment in all its forms, believing that all people, regardless of race, religion or gender, have the right to pursue their material progress and spiritual development with freedom and dignity, economic security and equal opportunities.

**"Violence and harassment"** means behaviors, acts, practices or threats that are intended to cause, lead to or are likely to lead to any form of harm (physical, psychological, economic or sexual) to the victim and are either isolated or repeated.

**"Workplace violence"** means any incident of abuse, threat or assault on a person in the workplace during the performance of work duties. Indicative examples may include physical assault, aggressive behavior, threats, verbal abuse, insulting behavior. These are behaviors that constitute physical and psychological abuse, that cause physical or mental pain, diminish the personality, dignity and integrity of the employee.

**"Harassment"** means any behavior that may lead to the violation of a person's dignity and the creation of a problematic, humiliating and hostile environment for the victim.

**"Gender-based harassment"** means gender-related behavior that targets or violates a person's dignity and creates a problematic (intimidating, hostile, degrading, humiliating or aggressive) environment. This includes sexual harassment as well as harassment based on sexual orientation, gender identity or gender expression.

**"Sexual harassment"** means any form of unwanted verbal or non-verbal or physical conduct of a sexual nature that violates sexual dignity and creates an intimidating, hostile, degrading, humiliating or degrading environment for the individual. These are behaviors with a sexual tone or innuendo, manifested in actions or words, which are unpleasant and offensive to a person. They do not have to be repeated behaviors, as long as they are also an isolated incident in cases of serious sexual harassment as defined in Law 4808/2021.

Company employees should never engage in the above behaviors in the workplace.

The company will not tolerate any action that creates an intimidating, offensive, humiliating or hostile environment or causes feelings of fear, anxiety and discomfort among employees.

The recipient of such actions should immediately report such behavior so that the incident can be investigated and the company can take the necessary measures to combat violence and harassment to ensure a safe working environment. If the investigation conducted by the company reveals that the complaint was ultimately malicious and no incident of violence or harassment occurred, the motives for the malicious complaint will be investigated and the appropriate disciplinary sanctions will be imposed.

### **Health, Safety and Environment**

The company is committed to protecting the health and safety of its associates, staff, third parties and the environment and for this reason it has created a safe and healthy workplace.

#### **General obligations of the employer:**

- Taking all necessary measures to ensure that workers and third parties present at workplaces are protected from any risk that may threaten their health and physical integrity.

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- Implementation of any recommendations of technical and health inspectors.
  - Overseeing the correct implementation of the measures.
  - Communicating the risks to workers and the relevant legislation in force
  - Encouraging health and safety training for employees
  - Keeping an accident record

**General obligations of employees:**

- Application of health and safety rules
- Use of personal protective equipment
- Health and safety training

The company expects its staff to perform their duties without influence from alcohol and drugs. Smoking is not permitted in the workplace, except in specific areas of the outdoor area, specially designed for this purpose.

**4. Professional Behavior & Relations with Stakeholders**

**Offer and Acceptance of Gifts**

Kalteq makes it clear that: "We do not accept or offer money or anything of value as gifts for the purpose of obtaining personal benefits from those dealing with the Company. We do not offer gifts or benefits to third parties that exceed the boundaries of normal business practice and courtesy (such as promotional material of small value that usually bears the Company's logo, symbolic gifts during the holiday season that are considered socially acceptable) before informing and consulting with the Compliance Officer. We do not accept promotional gifts or other types of benefits (invitations to social events or any form of entertainment, excursions, sporting or cultural events, travel, etc.) from third parties if they are intended or appear to be intended to influence our judgment or a decision or are given in exchange for an action or omission by us. Promotional gifts or items offered by any employee personally may be accepted within the bounds of normal professional practice and courtesy, provided that their value is negligible and provided that their supervisor and/or the Compliance Officer is aware of them. In particular, for the acceptance of promotional gifts of higher value, the Compliance Officer is in charge and the Company's Management decides whether or not to accept them, or to consider the possibility of converting them into an invoice credit. The Company is the recipient of gifts that are the result of the application of incentive policies by partners for the achievement of specific goals, subject to agreement, which define the relevant rules for the allocation of such gifts to the staff. We inform the supervisor and/or the Compliance Officer of any offer or request for gifts or other benefits from third parties

**Conflict of interest**

The term "**conflict of interest**" usually describes cases in which the personal interests of an executive, employee or partner of the Company may directly or indirectly compete with the interests of the Company, thus affecting the ability of the employee or partner to provide objective and impartial professional conduct. If a conflict of interest arises, it

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should be reported immediately by the person involved to his/her immediate supervisor. In addition, all employees should inform their supervisor of any potential relationship with individuals or companies with whom the company has business dealings that could lead to a conflict of interest. In all cases, an employee should not consider his or her personal interest, financial or otherwise, to be superior to that of the Company. Treat customers objectively, avoiding favoring certain persons or discouraging cooperation with others without a valid objective reason.

### **Proper maintenance of financial and accounting records**

All Kalteq's books, records, accounts and financial statements must be maintained with a reasonable degree of detail, accurately reflect transactions and comply with applicable legal and regulatory requirements and internal guidelines. For example, staff members must:

- Ensure that purchase, sales and handling documents meet internal and external requirements and support efforts to ensure the safety of the Company's products
- Document and accurately record business expenses

Unrecorded or "off the books" money or assets are strictly prohibited. Kalteq requires honest and accurate recording and reporting of information in order to facilitate audit procedures, identify and close gaps and make responsible business decisions. Records must be retained or destroyed in accordance with the company's record/record retention policies and applicable legal and tax requirements. If you are unsure whether an expense is legal, ask your manager or other supervisor. Rules and guidelines are also available from the Finance Department.

### **Protection of corporate assets**

All employees of the Company are required to manage its assets responsibly and protect them against loss, damage, theft, misuse or unauthorized use. The Company's fixed assets, including its premises, office equipment, furniture, computers, software programs, transportation equipment, should be utilized in the best possible manner and with the utmost care. The preservation and proper use of the Company's assets (**tangible and intangible**) is the obligation of all and shall not be used for illegal activities, for personal gain or to serve purposes unrelated to official needs. In addition, the use of the Internet must be used only for official purposes without compromising the security of the Company's systems. Similarly, passwords to the Company's systems should be kept secure. Any employee who observes that measures to protect the Company's assets are inadequate must inform his or her supervisor, and must do the same in cases of theft, attempted theft, sabotage or vandalism.

### **Information Disclosure and Corporate Image**

No person may make any disclosure of information either orally or in writing on behalf of and in the name of the company, unless he or she has received prior authorization to do so. The use of "publications" or electronic media bearing the company's logo for the disclosure of personal opinions, beliefs or activities is not permitted.

Employees must obtain approval from management:



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- prior to their participation as speakers in any presentation in which they will be attending as representatives,
  - before publishing any signed message or press release, in order to confirm that the text does not contradict the strategic direction of the company and does not put its reputation at risk

### **Bribery and Corruption**

Kalteq is committed to complying with applicable laws against illegal procurement, bribery and corruption. Management and all employees undertake to act with absolute integrity and honesty and shall not offer, promise, authorize, accept or pay illegal commissions, bribes or any item of value (directly or indirectly) to natural and legal persons, as well as public officials and employees, in order to improperly secure or offer favorable treatment, directly or indirectly in the performance of any activity related to the Company.

The company does not provide, offer, or accept improper payments under any circumstances, even if the end result is the loss or removal of a business opportunity. It also does not allow any kind of activity related to illegal financing or money laundering, strictly complying with all relevant laws and regulations.

### **Fair competition**

Kalteq seeks to operate in a fair and honest manner. We do not seek competitive advantage through unfair or illegal business practices.

It is strictly prohibited to steal or otherwise improperly obtain proprietary information from another company, which holds trade secret information, obtained without the owner's consent or which caused such disclosures by former or current members of other companies.

The company expects staff members and partners to treat customers, suppliers, competitors and other members of the organisation fairly. We do not take unfair advantage of anyone through manipulation, concealment, misuse of privileged information, misrepresentation of material facts or any other intentional unfair trading practice. It is also prohibited to cooperate with a competitor or take actions that could have an unfair anti-competitive effect without prior approval.

### **Relationships with Health Professionals**

Kalteq is committed to ethical interactions with healthcare professionals. Strong working relationships with healthcare professionals are essential to the company's success and continuous improvement and innovation in patient care. The Company and its partners interact daily with healthcare professionals who are customers and recommend and use our products and services. The company and its affiliates do not use interactions with health care professionals to improperly influence the purchase, lease, recommendation, use, prescribing or coverage decisions regarding its products and services. All product decisions must be made in the best interest of the patient and not in exchange for

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any kind of payment or other advantage from the company. All arrangements with health care professionals must be appropriately approved and properly documented.

Kalteq never conditions or rewards a financial agreement with healthcare professionals. The company and its affiliates do not provide free products, services or grants to healthcare professionals in exchange for an express or implied agreement to use, purchase, order or recommend products that it represents or manages.

### **Confidential Information & Personal Data**

All employees in the performance of their duties may receive confidential information, including information about profits, new products, financial data, personal data of employees and third parties, new partnerships, business choices and plans, strategic objectives, etc. Employees with access to confidential information are not permitted to use or share such information for personal gain, for the benefit of others or for purposes other than conducting company business.

It is the obligation of all employees to safeguard this information and not to disclose it to persons outside the Company, including members of their family and friends.

At the same time, Kalteq is committed to implementing and maintaining appropriate physical, organizational and technical measures for the protection of the personal data of its employees, its partners and third parties, in accordance with the applicable legislation and the Company's Security Policy.

All staff are informed and trained on developments in legislation on the protection of personal data and are bound by a confidentiality statement to comply with it.

Each external Partner and Supplier must sign either a Data Processing Agreement (DPA) or a Confidentiality Statement before starting their cooperation with the company.

### **Our commitment to Quality**

Patients and healthcare professionals rely on the company's dedication to the quality of its products, tools and services. By implementing our quality policy we are committed to the following GOALS:

- continuous increase in the degree of satisfaction of our customers, overall and individually in the areas of productivity, usability and quality for patients
- improving productivity
- reduction of our customers' complaints
- continuous training of workers

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In order to better achieve the above objectives, we make this policy of quality visible in the services and products we develop in our company, and we document the systematic way in which we serve this policy through a Quality Management System, based on the requirements and specifications defined by the international standards **ISO 9001:2015 and ISO 13485:2016**. To this end, we apply it rigorously and continuously improve it, through systematic processes of evaluation, review and redesign, so that it remains effective and serves the quality objectives that we adapt each time to our rapidly evolving environment.

All staff members have an important role in the continuous improvement of the Company's quality management systems and procedures. We rely on staff members to follow applicable laws, regulations, policies and procedures. Staff members are encouraged to ask questions and raise concerns about issues that may affect the quality or safety of products and services.

### **Advertising and Marketing Practices**

Kalteq follows the applicable regulatory requirements, as well as the guidelines and circulars of the National Competent Authority for Medical Devices (EOF) governing advertising and marketing practices.

Advertising and promotion of the company's products are subject to internal approval procedures. Staff members must take care to provide an accurate representation of the features and benefits of products and services. All promotional presentations, including product claims and comparisons, must be accurate, balanced, unbiased, objective, clear and consistent with product labeling. Similarly, comparisons of the products marketed by the company with a competitor's products must be fair, documented and in compliance with all laws and regulations.

We should not discredit our competitors' products, services or employees. We promote our products only for their approved uses as determined by manufacturers, regulatory authorities and government agencies... Activities related to health care professionals must comply with applicable regulatory requirements and practices and meet fair market value requirements.

### **Charitable, Educational or Humanitarian Efforts**

Kalteq is committed to the communities in which it operates and is active, encouraging the participation and support of charitable, educational and humanitarian organisations and activities, subject to applicable laws and regulatory requirements.

### **Environmental & Social Responsibility**

Kalteq, is committed to protecting the environment and implementing processes with the minimum negative environmental impact. We comply with all applicable environmental laws, including those concerning waste disposal.

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## 5. Validity and Compliance with the Code

The Code of Conduct and Business Ethics of Kalteq S.A. is approved by the President ..... and is communicated to all members and associates acting on behalf of the Company: Managers, Directors, Consultants, Auditors and employees of the Company, including employees working on part-time or fixed-term contracts.

Management, employees and associates have a responsibility to read and understand the Code and to seek additional guidance and clarification where necessary. They are accountable for any failure to apply it.

Managers and supervisors have an increased responsibility to ensure that all employees understand and comply with the Code.

All employees have an obligation to conduct themselves in accordance with the legal and ethical standards outlined in the policies and procedures of the Company's Code. Kalteq S.A. expects all its members and associates to sign a written acknowledgement that they have read, understood and agree to abide by the Code, as well as any revisions to it.

If there is a conflict between the Code and a law or regulation, the more restrictive requirement will apply. Staff members who believe there is a conflict between the Code and a law or regulation should contact the Personnel Division or HR & Compliance.

For any question that may arise regarding the application of this Code, the competent authority is the Directorate of the System & Compliance.

Kalteq S.A. reserves the right to periodically review the Code and make the necessary revisions when required.

## 6. Breach of the Code

### Incident Report

In the event that staff members or associates become aware or suspect that an employee or associate may have violated company policies and procedures or applicable laws, regulations and industry codes, they must report the concerns or violations directly to their managers or the HR & Compliance Department. Compliance.

It is very important to report such violations immediately so that the company can prevent illegal or unethical conduct or its continuation and also prevent a situation from escalating. Reports and identities of reporters will be treated in confidence, consistent with the Company's obligation and commitment to investigate such reports and any legal disclosure requirements.

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We are obliged to inform the company of any suspicions or concerns about incidents of fraud, corruption, bribery, harassment at work and general deviations from the Code of Conduct and Business Ethics that come to our attention, through:

- the petition box
- Anonymous or signed, written letter addressed to the Compliance Officer at the following address: KALTEQ S.A. 19 Paleologou str., Chalandri 152 32 with the indication "Confidential"
- E-mail to [compliance@kalteq.gr](mailto:compliance@kalteq.gr)
- the code violation reporting form

Failure to disclose known or potential violations can have significant consequences. Depending on the severity of the violation and applicable laws, employees or associates who violate the Code, fail to report a potential compliance issue, withhold information about an actual or suspected compliance or legal matter, or otherwise fail to cooperate in an investigation will face appropriate disciplinary action, which may include termination of employment or service. In addition, staff members or associates who violate laws and government regulations could expose themselves and the company to significant fines, penalties and damages.

### **Retaliatory Actions**

Kalteq strictly prohibits retaliation against anyone who reports a known or suspected violation. Staff members who retaliate against other staff members should be aware that they are in violation of the Code and will be subject to disciplinary action up to and including dismissal. Retaliation/retaliation may also constitute a violation of the law and may expose the individual offender and Kalteq S.A. to legal liability.

### **CHANGES TO THE CODE**

This Code may be amended in order to adapt and comply with the legal framework in force at any time. In the event of any change, employees will be informed in the most appropriate manner by the Employer.