

surgicalscience

Code of conduct

SEPTEMBER 2022



Workplace environment

A HEALTHY AND SAFE WORKPLACE

At Surgical Science we strive for the work environment to be physically, mentally, and socially healthy and safe for our employees. This means that we work actively to minimize the risk of occupational injuries, accidents or mental illness and implement activities that directly promote employee health and job satisfaction. Moreover, the work environment must meet relevant legal requirements and standards. We continuously strive for improvement in all health areas.

Everyone expects to take personal responsibility for improving the work environment in the daily work and actively contribute to eliminate and report any potential risk of injury or illness. This includes complying with our work environment policy and other regulations, instructions, and applicable laws.

DIVERSITY, EQUALITY AND NON-DISCRIMINATION.

At Surgical Science we are convinced that different experiences, backgrounds and perspectives among our employees are crucial factors for the innovation, productive climate, and success of our business. As an international company we believe that diversity is essential for understanding our customers' needs and reaching our full potential. By diversity, we mean that our differences are our strengths. This includes age, gender, gender expression or identity, ethnicity, physical conditions, religion or other beliefs, sexual orientation and different ways of thinking and acting. None of these should be the reason for different treatment of individuals which would imply discrimination.

Everyone at Surgical Science shall work actively for an inclusive and non-discriminatory work climate. This implies contributing to a physically, socially, and organizationally suitable work environment for current and any future colleagues. We must ensure that all employees are provided with equal opportunities and respect. The company does not accept any form of discrimination, bullying, or harassment. Everyone should report behaviours that appear discriminating or harassing towards themselves or others.

FAIR WORKING TERMS

Surgical Science applies fair work terms and makes sure to follow applicable national and international labour standards. This includes fair wages and benefits in line with national law and standards within our



→ industry. Furthermore, we make sure to comply with national regulations regarding work hours and respect our employees' freedom of association. We encourage employees to acknowledge and report work terms that are not in line with our policies or applicable law.

DRUGS AND ALCOHOL

For everyone's safety and health, Surgical Science will take any appropriate action to ensure a drug- and alcohol-free workplace. The company does not accept any employee performing their work with influence from any form of alcohol or illegal drug. For any employee suffering from addiction, we must strive for the individual to receive appropriate and effective help and support for recovery.



CHILD LABOUR AND FORCED LABOUR

At Surgical Science we do not accept any form of forced labour or child labour in our business or among our suppliers, customers, or other business partners. Under no circumstances, will Surgical Science employ any person under the age of 16 or below any higher minimum age in local regulations.

Managers and recruitment involved staff are expected to ensure that all employees have freely chosen to work, are equally free to leave under the terms of their employment, and that they are above minimum employment age.

Business operations

BUSINESS PARTNERSHIP AND CUSTOMER RELATIONSHIP

At Surgical Science we are committed to treating all our business partners fairly and in good faith. Surgical Science will only partner with businesses with good reputation and management integrity. Furthermore, we shall evaluate and select business partners based on their ability to meet the requirements of our Code of Conduct.

ANTI-CORRUPTION AND BRIBERY

Surgical Science has zero tolerance against corruption. The company does not accept bribes, favors, or gifts or solicitation of such, whatever the form, method or purpose, in its business dealings. We advocate free and fair trade and follow ethical standards.

Surgical Science is committed to complying with applicable anti-corruption and anti-bribery rules in all countries where the company operates. This includes complying with relevant legislation, industry rules and generally accepted codes of business conduct in each country where Surgical Science operates.

No employee shall offer, seek, or accept any gift (whatever its form) or personal favor that might influence business-related decisions, actions or transactions, or which are contrary to applicable laws or customary business practices.

This prohibition includes cash (or money in whatever form), items of value, invitations and trips/vacations.

FAIR COMPETITION AND ANTITRUST

Surgical Science believes that fair competition is vital to ensure market efficiency and to succeed. Surgical Science is committed to complying fully and in good faith with antitrust laws and regulations as well as all applicable competition rules in countries where the company operates. Surgical Science will compete vigorously and fairly and without anti-competitive understandings or agreements with competitors, suppliers, business partners or customers.



→ **TRADE COMPLIANCE**

Surgical Science is committed to complying with international trade rules, including tax and customs laws and applicable export, import, transit and trade compliance laws in countries where Surgical Science operates. Employees are responsible for following all trade laws and regulations that apply in the country where they work.

ANTI-MONEY LAUNDERING

Money laundering allows criminals and others to use funds obtained illegally to support criminal activities, such as trafficking, terrorism, or fraud. Surgical Science does not accept or support money laundering. Employees should ensure that they know the terms of all transactions and be alert for signs of money laundering.

SECURITY OF ASSETS

Surgical Science's assets shall not be used for any outside business or personal gain, nor for any illegal or



ENVIRONMENTAL RESPONSIBILITY

At Surgical Science we work to decrease our environmental impact and improve the sustainability of our activities and products. We use resources responsibly and strive to minimize the impact of waste, energy and transportation, etc., in our daily work. Furthermore, we

make sure to follow applicable laws and regulations in all countries where we operate. Together with our suppliers we set up requirements for transparency and continuous improvement of their environmental impact from goods, packaging, and transport. Before we book

travel, we consider the necessity of the trip and encourage digital meetings whenever possible.

All employees shall comply with applicable laws and regulations and be aware of and follow Surgical Science's policies.

→ unethical purposes. Everything we use when carrying out our work, including the buildings we work in, the computers and mobile devices we use, the ideas we develop, the emails we exchange etc., are company assets that we are entrusted to protect and use with care.

Data files, networks, and software/IT services are used according to specific rules set out in Surgical Science's IT policy, to ensure our communication channels and data storage are protected from unauthorized use.

As part of their employment contracts, all employees undertake to observe full confidentiality concerning Surgical Science's internal affairs, such as business plans, profitability, employees, pricing, processes and all other information that could be considered as sensitive. For any sensitive information that the employee has received during employment, the confidentiality of this information is applicable in perpetuity beyond employment.

We respect and do not use without approval any assets, including intellectual property, that belongs to clients, partners, or others.

INSIDE INFORMATION

The Surgical Science share has been listed on Nasdaq First North Growth Market in Stockholm since June 19, 2017.

Each employee is responsible for knowing the applicable requirements for inside information so that, for example, inside information remains confidential until disclosed. It is important that all employees handle all company information carefully.

The requirements are primarily governed by article 17 of the EU market abuse regulation (596/2014) ("MAR"), which entered into force on 3 July 2016 and the Nasdaq First North Growth Market Rulebook.

Inside information refers to information of a specific nature that has not been published, which directly or indirectly relates to one or

more issuers or one or more financial instruments and which, if published, would possibly have an essential impact on the price of the financial instruments.

The main rule of Surgical Science's information disclosure is that the company should inform the public as soon as possible regarding inside information that is directly related to the company and so that such information should be made public to all target groups at the same time. Information should be quick, simultaneous, correct, relevant and reliable.

For more information, please refer to Surgical Science's Information Policy.

PROTECTION OF PERSONAL INFORMATION

The basis of any good relationship is trust. When entrusted with personal information, Surgical Science respects customers' and employees' privacy and collects and handles this information only for legitimate business purposes.



→ We are committed to keeping personal data safe and secure and being open and transparent about how we manage personal data.

Surgical Science stores its internal guide-lines for collecting, storing, using, and sharing personal information in a specific Privacy Policy. All employees are expected to be aware of and follow our Privacy Policy.

CONFLICT OF INTEREST

Everyone at Surgical Science is expected to act in the best interest of the company. This means we must never allow our personal interests to influence our actions on behalf of the company. Every decision at work must be objective and with our company’s business interests in mind. Furthermore, employees shall be aware of the risk for potential conflicts and keep in mind to recognize these types of situations. For instance, if it is the case that relatives or friends apply for a job at Surgical Science, or there is an investment opportunity in clients’ or competitors’ businesses, we should

ask ourselves “Could my personal interests or relationships influence the decision I make?” As soon as we are uncertain, we should seek guidance from our manager.

POLITICAL AFFILIATION

Surgical Science does not take political stands and company assets are not used to support political campaigns or candidates, or otherwise provide services to political endeavours. Employees may support political campaigns, causes, or candidates on their own time and using their own resources, but may never use Surgical Science’s name or resources (e.g., email addresses, phone numbers, employee lists, company products, company equipment) for political activities.



LAW COMPLIANCE AND RELATIONSHIP WITH GOVERNMENT AND REGULATORY AUTHORITIES

Surgical Science’s policy is to understand and comply with all laws, regulations and rules that apply to its businesses. Employees are responsible to have a familiarity with the principles of law that affect the performance of their job, to obtain from Surgical Science any training needed to perform their duties and to seek the advice of their supervisor and managers if

uncertain of relevant job requirements or legal principles.

Surgical Science will provide accurate, relevant information and records to government and regulatory authorities that are legally authorized to ask for such information.