



Global Code of Business Conduct

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A LETTER FROM CEO AURELIO SAHAGUN

Advita Ortho Team Members,

Integrity is the foundation of our success. Guided by our shared values, we're committed to acting ethically and responsibly in every aspect of our work. Our Global Code of Business Conduct is a vital resource that helps us navigate challenges and uphold the trust placed in us by surgeons and patients worldwide.

I encourage you to read this Code carefully and apply its principles each day. Together, we continue to foster a culture grounded in integrity, transparency and accountability.

Aurelio Sahagun
Advita Ortho CEO



OUR VALUES, OUR MISSION, OUR CODE

- Why do we need this code?



OUR VALUES, OUR MISSION, OUR CODE

We are driven by our mission to enhance the lives of patients by empowering surgeons with high quality, transformative innovations in orthopedics. We also strive to advance the path to mobility for patients as the industry's most trusted orthopedic surgeon partner.

All Advita Ortho employees, direct sales representatives, independent sales professionals, and associates that directly or indirectly develop, distribute, and sell products on behalf of Advita Ortho are committed to living our core values and fulfilling our mission.

We do this through innovative ideas, high quality products, education, and commitment to service.

Our ultimate success depends on how well we live out our core values of vitality, innovation, teamwork, and accountability.

Vitality	Am I creating an environment that supports the growth and thriving of both my ideas and the people involved?	Am I consistently pushing myself to keep my ideas alive and thriving, even when things get tough?
Innovation	Am I putting customers and patients first?	Am I actively listening to ideas or concerns?
Teamwork	Am I treating others as I would like to be treated?	Am I valuing the perspective and opinions of others?
Accountability	Am I taking responsibility for my decisions and actions?	Am I acting with clear and transparent intent?



WHY DO WE NEED THIS CODE?

We operate in a highly regulated industry where the laws that apply to our business are extensive and complex. Even a single act of misconduct, whether intentional or not, could subject Advita Ortho, its employees, and its associates to civil or criminal liability under multiple laws across several jurisdictions. Additionally, we could be excluded from government healthcare and reimbursement programs, which would be devastating to both our business and our reputation.

While it is impossible to address every issue that you may face in performing your job, our intent is that this Code will equip you with tools to address issues you may face.

We all must understand and comply with this Code. By doing so, we protect not only the Company, its customers, and its associates, but most importantly, Advita Ortho's reputation and the integrity of our mission. We must always remember that there is no right way to do a wrong thing. How we realize our purpose is as important as the purpose itself.

Consistent with these values, we are committed to our Compliance and Ethics Program (CEP) and its supporting policies and procedures, which is based on the laws of the countries in which we do business, as well as applicable industry codes of ethics of which we may or may not be members.

We all have an obligation to understand the laws, regulations, and the policies and procedures described in this Code and in our Compliance and Ethics Program (CEP). We must also be willing to defend the Code by challenging and raising concerns when we feel it is at risk of being violated.

Anyone with questions concerning this Code, our CEP, or any other compliance concerns should contact their team leader, the Legal Department, or the Compliance Department. The last session of this Code contains information about reporting any concerns you may have by using our reporting system.

We believe that compliance is not something that we do but must be part of who we are.



OUR COMMITMENT TO OUR COLLEAGUES

- Equal Opportunity, Diversity, and Inclusion
- No Discrimination, Retaliation or Harassment
- Health, Safety and Security
- Drug Free Workplace
- Avoiding Conflicts of Interest



OUR COMMITMENT TO OUR COLLEAGUES

Advita Ortho personnel are the only resource that we cannot duplicate. We are committed to the following principles.

EQUAL OPPORTUNITY, DIVERSITY, AND INCLUSION

Providing equal employment opportunities has been and will continue to be a fundamental principle at Advita Ortho. We want a workplace where everyone feels supported and included, and where everyone treats all employees and associates with dignity and respect. We make fair and objective decisions regarding hiring, promotion, compensation, and work opportunities to create a safe place to work, where all our employees in all job levels have an equal opportunity to succeed.

Why it matters: advancing a culture of inclusion, engagement, and belonging empowers us to seek different points of view and listen to others with courtesy and respect, helps us to generate new ideas, drives innovation, and enables us to better understand our partners worldwide.

Examples of inclusion:

- Be aware of unconscious bias and provide adequate training.
- Encourage frequent employee feedback.
- Celebrate differences: acknowledge different cultural holidays, women's day, etc.

NO DISCRIMINATION, RETALIATION OR HARASSMENT

The Company has a zero-tolerance policy for harassment, retaliation, or discrimination in the workplace. We promote a work environment free of discrimination, retaliation, physical or verbal harassment, bullying, or incivility. We value the contributions of all



our employees and associates, and we encourage them to express themselves and their opinions freely in a professional way.

Why it matters: the Company can be held responsible for the actions of all its employees or associates in every job category, including independent contractors, for discriminating or harassing conduct and failing to take appropriate actions.

Examples of what is not harassment:

- Behaviors that arise from a relationship of **mutual consent** and are infrequent such as a hug between colleagues, or a compliment on physical appearance, or a supervisor treating an employee to a meal to celebrate a milestone.
- Requests to meet job description requirements such as dress codes, deadlines, employee performance standards, or attendance requirements, just to name a few, are not considered harassment.

HEALTH, SAFETY, AND SECURITY

We take care of each other by ensuring our work environments are safe and meet all relevant environmental, health, and safety regulations. We appreciate, encourage, and expect your participation and input on health and safety matters, including reporting any matter you feel places you or your co-workers' safety at risk.

Why it matters: we must protect and promote the health and safety of our employees, associates, customers, and the communities in which we operate. This depends on the continuous cooperation of all employees. You are responsible for familiarizing yourself with and practicing the safety procedures, workplace hygiene standards, and environmental regulatory requirements specific to your job.

EXAMPLES OF SAFE WORKING CONDITIONS:

- Using equipment with proper safety controls or in a safe manner.
- Performing tasks with proper training.
- Following safety guidance and using personal protective equipment.



- Don't take shortcuts – always follow your work health and safety procedures.

DRUG FREE WORKPLACE

We want a workplace where all employees adhere to a program of policies and activities designed to provide a safe workplace and discourage alcohol and drug abuse. The Company reserves the right, under applicable laws, to screen employees using Company vehicles or when there is a reasonable suspicion of drug or alcohol abuse.

Why it matters: benefits from implementing a drug-free workplace program include lower absenteeism, increased productivity, and fewer accidents.

IT IS PROHIBITED TO:

- Unlawfully possess, use, or distribute illegal drugs on Company property or at a Company-sponsored event.
- Bring alcohol onto Company property or to a Company-sponsored event without pre-approval.
- Misuse over-the-counter, prescription, or legalized drugs in the workplace.
- Be impaired by drugs or alcohol within the scope of employment.

AVOIDING CONFLICT OF INTEREST

Business judgments or decisions should not be influenced by personal interests. Conflicts of interest arise when personal, social, financial, or political interests interfere with Advita Ortho interests. Conflicts of interest may also involve family members and others with whom you have a close personal relationship.

As an employee of Advita Ortho, you are responsible for avoiding conflicts of interests or even the appearance of a conflict between your personal financial interests and the interests of the Company. While it is impossible to describe every kind of conflict of interest, it's not uncommon to encounter situations that have the potential to be a conflict of interest. What's important is that you disclose them.

Examples of common situations that may create a potential conflict of interest include:

- A close family member is an Advita Ortho customer or affiliate.



- You are the only person that supervises the salary, promotion, or performance of a close family member.
- You manage an outside business.
- You have a second job with an Advita Ortho competitor.
- You share an investment or property with an Advita Ortho customer.
- You or your close family members receive a gift from an Advita Ortho supplier, customer, or related third-party.

Conflicts of interest can impact our decisions and create the appearance of unfairness. Promptly disclose situations where we potentially have or could be perceived as having a conflict of interest. You need to immediately inform your direct supervisor, a member of human resources and a member of the legal department in your country and in our headquarters.

Why it matters: to ensure our business judgement is not influenced by personal interests, we must ensure that we make decisions that are in the best interests of Advita Ortho. Our Company time and assets may never be used for personal business ventures or outside employment. By taking steps to identify, avoid, disclose, and manage any potential conflicts of interest, we further our commitment to act with transparency and integrity.



OUR COMMITMENT TO OUR CUSTOMERS

- Interactions with healthcare professionals and government officials – our Business Courtesies
- Prohibition against Corruption and Bribery
- Marketing and Social Media
- Artificial Intelligence



OUR COMMITMENT TO OUR CUSTOMERS

Advita Ortho believes that its customer-centric focus distinguishes us in the marketplace as a company that truly listens to its customers' needs. We interact with healthcare professionals in a variety of ways, including as customers, business partners and consultants all over the world. These interactions are subject to various laws, regulations, and codes and Advita Ortho is committed to ensuring that these interactions are transparent, ethical, and compliant.

This Code may use the terms "customers" and "healthcare professionals" interchangeably, and "government officials" or "public officials" interchangeably.

Customers and healthcare professionals are used to collectively refer to any individual, institution, or other entity that prescribes, recommends, or purchases our products and services. Examples of customers include not only surgeons and hospitals, but also distributors, purchasing agents, material managers, and group purchasing organizations. Many of the countries in which we operate have national or public healthcare systems. In those countries, customers and healthcare professionals are also considered government officials or public officials.

Our potential customer interactions are very broad and could include a product training session between a sales associate and an operating room staff for the safe and effective use of our products, the negotiation of a consulting agreement with a physician, or developing a price agreement with a hospital purchasing manager. All our customer interactions, regardless of their scope, must be compliant with applicable laws, applicable industry codes of conduct, this Code, and its supporting policies and procedures. The Company's healthcare professional compliance policies and procedures are part of our CEP.

INTERACTIONS WITH HEALTHCARE PROFESSIONALS AND GOVERNMENT OFFICIALS – OUR BUSINESS COURTESIES

We have established business courtesy policies to guide each employee and associates through the different laws and regulations related to the interactions with healthcare professionals and government officials in each country in which we do business. You are



responsible for following these guidelines before engaging in interactions with healthcare professionals, government officials, or any individuals or entities that influence the purchase of our products and services.

Why it matters: we respect the independent judgment of healthcare professionals, as their decisions regarding the best products and treatment for their patients should never be compromised. We never improperly influence healthcare professionals' or government officials' decisions in our interactions with them.

PROHIBITION AGAINST CORRUPTION AND BRIBERY

Avdita Ortho strictly prohibits bribes, payments, or other benefits offered to any person with the intent to influence them to use, recommend, or purchase our products and services, or to gain an unfair advantage in the market. This prohibition applies to our employees, associates, and any other individuals or entities representing our Company.

Anti-corruption laws are in place in every country in the world, and these laws often apply across jurisdictions, which means that even if you do not live and work in a particular country, that country's laws may still apply to you. For example, the United States Foreign Corrupt Practices Act applies to anyone who works for or on behalf of a United States company that does business internationally, or the United Kingdom Anti-Bribery Act that applies to any company having a relationship with the United Kingdom.

Why it matters: corruption erodes trust in both governments and businesses and reduces access to public services. To maintain trust, we do not engage in any form of bribery or corruption. We conduct our business with ethics and integrity and do not tolerate any form of bribery or corruption.

MARKETING AND SOCIAL MEDIA

Connecting with others via social media is a great way to build and strengthen networks, as well as create new business opportunities. However, it is important to keep in mind that not everything is appropriate or welcome in terms of posting about our work and it could harm our Company.



Social media includes any application or website that allows us to share content online. Examples include social networking sites, such as Facebook, Instagram, YouTube, TikTok, Twitter, or LinkedIn, as well as personal blogs.

All social media posts must be professional and made in accordance with this Code and the related policies and procedures. We communicate about our products in a way that is truthful, accurate and not misleading. Our marketing and promotional media should be thorough, informative, and compliant with related regulatory clearances and guidelines. Misleading or false advertising is against the law and could subject the Company to significant criminal and civil penalties.

Why it matters: we communicate to customers about our products and services to help them make informed decisions about the best treatment for their patients. By ensuring our communications are truthful, accurate, and not misleading, we uphold our reputation and build trust and confidence in our products. Sometimes, the most well-meaning person can post a photograph or idea about something relating to their work, but in doing so, bring about undesirable and unintended consequences. We must be careful how we use social media.

If your job relates to the promotion of our products, you should be aware of the laws and regulations that govern your job responsibilities. If you are unsure whether a law applies to you, or you have questions about the specific laws and regulations in place where you live and work, please do not hesitate to contact a member of the Legal, Marketing, or Regulatory departments.

ARTIFICIAL INTELLIGENCE

Artificial Intelligence (IA) can help to improve customer experience, drive automation, and provide predictive analytics. We use our AI systems with a clear purpose that is respectful of human rights, and is accurate, truthful, not misleading, and appropriate for their intended context.

Why it matters: AI has the potential to be used to improve the speed and accuracy of diagnosis, treatment protocols, patient monitoring, and patient care, among other applications, that will improve patients' lives.



OUR COMMITMENT TO THE MARKETPLACE

- Antitrust and Fair Competition Laws
- Customs and Trade Laws
- Ethical Use of Information
- Monitoring the Safety and Effectiveness of our Products
- Interacting with Third Parties



OUR COMMITMENT TO THE MARKETPLACE

This section of the Code describes the laws, rules, and regulations that govern our interactions in the marketplace, including interactions with healthcare professional, patients, customers, government agencies, vendors, suppliers, and business partners.

Remember, how we achieve our mission is as important as achieving the mission itself.

We will:

- Comply with all applicable regulatory, healthcare, competition, and commerce laws in the conduct of our business.
- Monitor the safety and effectiveness of our products.
- Promote fair and ethical competition.
- Provide accurate and informative product education materials for surgeon and patient audiences.
- Ensure our interactions with healthcare professionals, government officials, suppliers, and vendors are compliant and ethical.

ANTITRUST AND FAIR COMPETITION LAWS

Antitrust and anti-competition laws ensure that all competitors have a fair opportunity to compete. These laws are designed to maintain free and open competition. They determine how we can compete and interact with other companies, and they prohibit interactions between competitors that give an unfair advantage to those competitors or unreasonably restrict competition for other competitors. We will not engage in agreements or conduct that unlawfully prevent or restrict competition. We are proud to compete on the merits of our products alone.



Why it matters: competition drives innovation and leads to greater choice of higher quality products at competitive prices, benefiting our customers, patients, and society.

To ensure that we are promoting fair and lawful competition, Advita Ortho prohibits the following:

- Discussions with suppliers or vendors that have the effect of hampering or excluding competitors in the marketplace.
- Communications or discussions with competitors about costs, pricing, or terms of sale.
- Written or verbal agreements with competitors to allocate markets or customers.
- Agreements with competitors that will either exclude competitors from the market or that will unfairly affect their ability to compete in the market.

These laws are in place in various forms around the world, and if your job responsibilities relate to the sales and marketing of our products, it is important that you know and understand those laws which apply to your responsibilities. If you are unsure, you should contact a member of the legal and compliance team in your country or in our headquarters.

CUSTOMS AND TRADE LAWS

All the countries in which we do business have implemented trade laws that govern the import, export, and transport of our products and materials across borders. Political instability in a particular region may result in further trade prohibitions or restrictions. Violation of these laws or restrictions result in severe civil or criminal penalties.

Why it matters: complying with customs regulations, export controls, and trade sanctions laws allows us to deliver our products in a timely manner to patients who need them.

If your job responsibilities include the international sale and distribution of our products, you are responsible for understanding the applicable policies and procedures in your workplace. If you are unsure of whether a certain territory has been approved,



please contact a member of the Regulatory or Legal team for clarification before engaging in any interactions in that country.

ETHICAL USE OF INFORMATION

The internet age has made it very easy to readily access information about virtually any topic. It is important for us to be aware of developments in the marketplace, including the activities of our competitors, but we must be careful to gather such information ethically and lawfully. We may also employ individuals who have worked for our competitors. You must never use or disclose the confidential or proprietary information of a third party or violate any confidentiality or non-competition agreements you held with a previous employer. You should never use or ask a third party to gather information in an unethical or illegal manner.

Why it matters: Advita Ortho takes these prohibitions very seriously, and we respect the confidential and proprietary information of our competitors just as we expect them to respect ours. Any violations of this policy will be grounds for disciplinary action, up to and including termination.

MONITORING THE SAFETY AND EFFECTIVENESS OF OUR PRODUCTS

We have a legal and moral obligation to ensure that our products are safe and effective for their intended use and therefore it is very important that we have rigorous post-market clinical outcomes surveillance and quality programs.

Advita Ortho is required to track, investigate, and report complaints to the appropriate regulatory authorities and our failure to do so could result in our exclusion from the market. All Advita Ortho employees, customers, associates, and business partners share an obligation to promptly report complaints and issues related to the quality or safety of our products.

Why it matters: delivering products that are safe and meet regulatory requirements through our effective quality system reflects our passion to create better customer and patient outcomes. This allows Advita Ortho to maintain a reputation based on trust and integrity.



Product issues can be reported through email, telephone, text message, or verbally. If you need to make a product complaint, please contact the Advita Ortho Complaints Team in our headquarters as soon as possible.

INTERACTING WITH THIRD PARTIES

We expect our business partners or third parties that we interact with, whether consultants, vendors, distributors, independent sales agents and representatives, commissions agents, customers, dealers, or others, to comply with the law, to practice ethical business conduct, and to respect our standards and commitments.

Why it matters: we are committed to conducting our business ethically and lawfully, and we expect the same of our business partners. The actions of our third parties can significantly impact on our business operations and reputation, and we can be held responsible for anyone acting on our behalf. Our success depends also on the strong, reliable, and reputable partners that we choose.



OUR COMMITMENT TO OUR BUSINESS PARTNERS

- Business Continuity and Crisis Management
- Confidential Information and Cyber Security
- Protecting Personal Information
- Maintaining Accurate Business and Financial Records Management
- Transparency
- Government and Regulatory Agency Inspections and Investigations



OUR COMMITMENT TO OUR BUSINESS PARTNERS

We are committed as a company to protecting the interests of our business partners by acting ethically and lawfully, being transparent about our business operations and financial performance, and acting as prudent stewards of our resources.

BUSINESS CONTINUITY AND CRISIS MANAGEMENT

It is our responsibility to ensure uninterrupted supply of key products and services to our customers and patients. This means implementing appropriate business continuity measures to ensure the uninterrupted delivery of our products and services in the event of an emergency or natural disaster.

We are all responsible for protecting our assets from loss, damage, improper use, or incident. These assets include the physical, informational, financial, and intangible items we use each day to do our work and to support our growth. Theft, carelessness, and waste have a direct impact on our profitability.

Why it matters: our products improve people's lives. Our customers, patients, and our business rely on the continuous supply of our products.

CONFIDENTIAL INFORMATION AND CYBER SECURITY

It is important in fulfilling our commitment to our business partners, customers, and colleagues that we recognize the importance of protecting our confidential information and proprietary assets.

Confidential information includes non-public information that might be useful to competitors or harmful our company and our customers if disclosed. Examples include:

- Proprietary information, such as device designs, strategic plans, and manufacturing processes of our products.
- Trade secrets, trademarks, and other intellectual property.
- Non-public financial information, such as pricing list, sales plans, etc.



- Potential acquisitions and investments.
- New product information and marketing plans.
- Customer, third-party and employee lists.
- Clinical data, personnel records, patient information.

Proprietary assets are:

- Physical assets: such as office supplies, furniture, mobile devices, computer equipment, facilities, machinery, products, and materials.
- Informational assets: such as information and data related to Advita Ortho's business, wherever it's stored.
- Financial assets: such as money, stocks, bonds, loans, and deposits.
- Intangible assets: such as our reputation, ideas, intellectual property, designs, and trade secrets.

We have an obligation to maintain the confidential nature of this information and to implement sufficient controls to prevent the unauthorized access, use, and disclosure of such information.

Why it matters: we must protect our data and technology and ensure that information is kept safe from theft, loss, misuse, or disclosure.

Failure to have these controls in place could subject us to significant liability. You should know and understand the following standards with respect to our confidential and proprietary information:

- You must comply with our information security policies in maintaining confidential and proprietary information. Secure documents, data, and devices when not being used (including personal devices used to conduct Advita Ortho business).
- Don't share passwords for Advita Ortho networks or devices.
- Use caution when transmitting electronic information outside of our secure networks.
- Avoid downloading Advita Ortho files on an external device.



- Confidentiality or Non-Disclosure Agreements must be in place before you may disclose any of our company's proprietary or confidential information. All requests for Confidentiality/Non-Disclosure Agreements should be directed to the Legal Department.
- Immediately report any request for information from unknown sources or entities to the Legal Department.
- Be mindful when discussing confidential information and avoid doing so in public places, such as elevators, public transportation, restaurants, and social media.

PROTECTING PERSONAL INFORMATION

We have a moral and legal obligation to protect the personal information of our colleagues, customers, associates, third parties, and patients. Personal information, also known as personally identifiable information (PII), is any information that can directly or indirectly identify an individual. Examples include:

- General information, such as names, dates of birth, addresses, or email addresses.
- Government-issued identification numbers, such as passport numbers or national identification numbers.
- Log-in credentials, such as usernames or passwords.
- Financial information, such as credit card numbers or account numbers.
- Health-related information, such as medical records or images.

This information must be transmitted and stored in compliance with all applicable privacy laws including, not limited to international laws such as the EU Global Data Protection Regulation (GDPR). Personal information should only be collected for a legitimate business purpose, such as the post-market monitoring of our products, and should be shared only with those individuals with a legitimate need for such information. Personal information should not be retained past the fulfillment of its business purpose.

Why it matters: the responsible use of data helps us maintain trust with our business partners, including associates, customers, healthcare professionals, and the public.



Please bear in mind that privacy laws vary from country to country, with many countries having stricter rules than the United States. In any case, you are responsible for retaining all Company information and communications exchanged through Advita Ortho devices, or Company information and communications on your personal devices used for business purposes (laptop, mobile phones, tables, etc.) because they are Advita Ortho property.

MAINTAINING ACCURATE BUSINESS AND FINANCIAL RECORDS MANAGEMENT

We strive to be a company that people want to invest in, and to gain the trust of our business partners by making truthful public disclosures and by maintaining effective controls over financial reporting to ensure a complete and accurate record of our financial and business transactions.

Every employee is responsible for ensuring that the business or financial records that they generate or control are accurate and are maintained in compliance with applicable document control and retention policies. Our records include all electronic and paper documents that contain Advita Ortho data, communication, policies, and procedures.

If you generate, work with, transmit or maintain any documents related to the manufacturing, distribution, or sales of our products you should assume that these are business records and must understand and practice the applicable document control policies for these records.

You should never make any disclosure of business or financial records to a third party, the public or governmental agency without first notifying and obtaining the authorization of a member of the Legal, Finance, or Accounting Departments.

Why it matters: proper oversight and accountability of Advita Ortho assets helps us meet our financial, legal, and regulatory obligations, ensuring that we remain a trusted partner. Remember, an unauthorized disclosure of our business or financial records could subject you and Advita Ortho to civil and criminal liability.

TRANSPARENCY



Many countries require a higher level of compliance from the medical sector. To avoid abuse or undue influence, medical device manufacturers are subject to transparency requirements regarding their spending in healthcare in multiple countries.

Manufacturers and distributors of medical devices and supplies must report, annually and transparently, payments made to or for healthcare professionals and government officials (also known as transfers of value). Our independent sales agency and distributors are also responsible for ensuring compliance with such requirements and reporting disclosures.

Why it matters: there are multiple laws and requirements for these public disclosures to consider in many countries. You are responsible for accurately documenting business activities, payments and expenses involving healthcare professionals and government officials. Carefully consider meeting locations, the need for travel and meals, and be mindful of how your actions on behalf of Advita Ortho may appear to others in public.

GOVERNMENT AND REGULATORY AGENCY INSPECTIONS AND INVESTIGATIONS

Our industry is highly regulated, and it is likely that we will face a government investigation or on-site inspection by a government agency. We expect our employees to fully cooperate in any such investigations or inspections. These investigations and inspections are designed to identify potential hazards and risks that may pose a threat to the public and to take measures to mitigate these risks.

Employees should never destroy or alter company documents, make false or misleading statements to a government investigator, influence or intimidate a co-worker to be uncooperative, interfere, or mislead in a government investigation.

Why it matters: these inspections are important because they help ensure businesses operate legally, ethically and in compliance with government regulations and industry standards.



OUR COMMITMENT TO OUR COMMUNITY

- Charitable Contributions and Participation
- Environmental Responsibility



OUR COMMITMENT TO OUR COMMUNITY

We are committed to improving the communities in which we live and work by being responsible corporate stewards of our local environments and communities. Our Company encourages employee participation in charitable and community organizations as well.

CHARITABLE CONTRIBUTIONS AND PARTICIPATION

It is important to be a positive presence in the communities in which we are located. Advita Ortho encourages employees to be active in community service activities, whether through financial support or personal participation. We are also committed to supporting patients in need by providing access to our products to needy patients. However, while we encourage and participate in charitable giving, charitable donations may not be contingent upon or related to, the referral, use of or purchase of Advita Ortho products or services. All charitable donations made on behalf of our Company must comply with our charitable donation policies, and if required by those policies, should be approved in advance by our Compliance Committee.

Why it matters: charitable contributions help support research, resources and social projects that otherwise wouldn't be able to function and exist.

ENVIRONMENTAL RESPONSIBILITY

Advita Ortho is committed to the safety and well-being of our communities and seeks to be effective stewards of our workplace environment as well as our surrounding environments. We will comply with applicable environmental laws and regulations relating to the manufacture and distribution of our products. We strive to make a positive effect on climate, with our reduce, reuse, and recycle philosophy, such as by reducing waste and water usage.

Why it matters: minimizing the environmental impact of our activities and products over their lifecycle protects the environment for future generations.



HOW TO REPORT AND ASK FOR HELP

- How to Report
- Internal Investigations



HOW TO REPORT AND ASK FOR HELP

Our Code is our guide to help us navigate difficult situations and ensure that we fulfill our mission and live our values. We are all accountable for understanding and following our Code.

If you are unsure about the laws and regulations applying to your daily work responsibilities, or if you become aware of any conduct that you feel is not right and conflicts with any portion of this Code, or if you are concerned whether an activity may violate a law or regulation, or you are unsure how to handle a specific situation or find any aspect of the Code unclear, you have an obligation to report such concerns immediately. We are committed to creating an environment where individuals feel comfortable raising concerns.

When faced with a situation where the right thing to do isn't clear, consider these questions:

- Is it in line with the principles set out in our Code?
- Is it in line with our mission and values?
- Could it negatively impact the trust we've built with our colleagues, marketplace, business partners, communities?
- Is there someone who could provide help or guidance with this situation?

HOW TO REPORT

There are different ways to seek guidance or raise ethical concerns. You can:

- Talk to your direct manager (such team leader, direct superior), members of the Human Resources, Legal or Compliance departments in your country or in our headquarter.
- Send an email to complianceofficer@advita.com.



- Use our reporting system. With this option you can also decide to report directly or remain anonymous. Our reporting system is approved to support applicable whistleblower laws in the countries where we do business. Your report will be noted and followed up on in a discreet and timely manner.
 - Visit our webpage Advita Ortho Reporting System.
 - Call one of the phone numbers to report your concern.
 - Send a report via the Reporting System. You also have the option to record a voice message to attach to the report. Your voice will be automatically distorted and unrecognizable.

INTERNAL INVESTIGATION

Advita Ortho wants every employee to feel secure that they can report concerns or misconduct under our Code without retaliation. Retaliation occurs when one employee takes adverse action against another employee for making a report in good faith or participating in an investigation of a report. Examples of retaliation include:

- Termination, demotion or failure to hire.
- Decrease or change in pay, job duties, hours or schedule.
- Withholding benefits, privileges or promotions.
- Harassment, threats or other negative behavior.

We are committed to taking appropriate corrective action for misconduct. Failure to comply with our Code, our company policies, applicable laws or engaging in any form of retaliation will result in disciplinary action, up to and including termination of employment.

We will make every effort to maintain the confidentiality of all reports and to protect the reporter's identity. However, depending on the circumstances of the report and any resulting investigations, it may not always be possible to maintain confidentiality, or may inhibit our Company's ability to investigate and resolve reports concerns.



You won't get in trouble for reporting a concern in good faith or for providing information related to a reported concern.

Everyone involved in a compliance investigation, whether as a witness, or a reporter, must also cooperate in maintaining such confidentiality. The persons involved in the investigation should only discuss with the Compliance and Legal department personnel conducting the investigation. Everyone involved in the investigation is responsible for retaining all company information and/or communications exchanged through Advita Ortho property assets, including personal devices used for Advita Ortho business. Any investigation will be conducted fairly and appropriately.

1 November 2025

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