



Medix Biochemica Group Code of Conduct

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Medix Biochemica

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1. INTRODUCTION

- Medix Biochemica Group Oy and its subsidiaries (collectively, “Medix Biochemica” or the “Company”) have built excellent reputation and strong market position through more than 30 years of successful operations in the in vitro diagnostics (IVD) market.
- In order for Medix Biochemica to retain and further strengthen its position, it is its duty to always conduct business activities in accordance with sound ethical principles. This Code of Conduct (“The Code”) describes commonly accepted practices, and Medix Biochemica’s commitment to compliance with laws and regulations.
- This Code of Conduct and our company values represent the standards by which we at Medix Biochemica must operate. All employees, officers and Board members of Medix Biochemica Group Oy and any its subsidiaries must abide by this Code of Conduct. Medix Biochemica’s contractors, consultants, suppliers, and agents must abide by our Code of Conduct in connection with their work for Medix Biochemica.

As a Medix Biochemica Employee

- I always conduct my business activities in accordance with sound ethical principles
- I abide to this Code of Conduct

2. COMPLIANCE WITH LAWS

- Medix Biochemica is subject to a number of laws, rules and regulations with respect to the conduct of its business. Medix Biochemica employees are expected to maintain compliance with letter and spirit of all laws governing Finland and other jurisdictions in which they perform their duties. Where local law requires a higher or additional standard than this Code, the local laws must be applied. If, by contrast, this Code provides for a higher standard, the Code prevails.
- There are serious consequences for failing to follow any applicable laws, rules and regulations, up to and including termination of employment contract with the Company and potential criminal and civil penalties. Employees have a personal responsibility to become familiar and comply with the laws and regulations related to job responsibilities.

As a Medix Biochemica Employee

- I maintain compliance with letter and spirit of all laws governing in Finland and other jurisdictions in which I perform my duties
- I have a personal responsibility to familiar myself and comply with the laws and regulations to job responsibilities

3. BUSINESS BRANDING AND IMAGE

- Medix Biochemica considers its branding, image, and corporate reputation to be among its most important assets. Employees contribute to the promotion and protection of Medix Biochemica reputation and its image through their actions and general behavior.
- As a result:
 - All employees must ensure that their actions do not damage the image and reputation of Medix Biochemica.
 - No employee may use Medix Biochemica's name and branding for uses other than those permitted by the Company.

As a Medix Biochemica Employee

- I do not damage the image and reputation of Medix Biochemica with my actions
- I do not use Medix Biochemica's name or brand for uses other than those permitted by Medix Biochemica



4. TRADE RULES

4.1 International Trade

- Medix Biochemica has customers and business partners all over the world. In international trade, the laws of one country may apply to transactions that occur in another country. It is important that Medix Biochemica employees involved in international trade are familiar and compliant with all applicable laws, regulations and restrictions related import, export, boycotts, customs and embargoes.
- Failure to follow these regulations and restrictions may lead to civil and criminal penalties, as well as to the loss of import or export privileges.

As a Medix Biochemica Employee

- If I am involved in international trade, I familiar myself and comply with all applicable laws, regulations and restrictions related to my actions
- I seek competitive advantage only through legal and ethical business practices

4. TRADE RULES

4.2 Competition and Antitrust

- Medix Biochemica is committed to complying with all competition and antitrust laws applicable in the countries in which Medix Biochemica operates. In driving the success of Medix Biochemica business, employees must seek competitive advantage only through legal and ethical business practices.
- Medix Biochemica must not, either alone or with others, act in ways that stifle the free market. Each employee must deal fairly with customers, service providers, suppliers, competitors and other third parties and must not seek to take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. Examples of business conduct that may violate antitrust and similar laws include:
 - Price fixing: Price setting among competitors, directly or indirectly.
 - Customer and market allocation: Agreement among competitors as to how markets are divided up, whether by territory, product or customer.
 - Unfair advertising: Comparison of Medix Biochemica's products with similar products of competitors in promotional campaigns, if the comparison is not based on actual objective studies or data.
 - Competitive information: Obtaining competitor's confidential information through improper or unethical means.

As a Medix Biochemica Employee

- I deal fairly with customers, service providers, suppliers, competitors and other third parties
- I do not seek unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material or any other unfair

4. TRADE RULES

4.3 Anti-Bribery and Corruption

- Medix Biochemica Code of Conduct prohibits any participation or involvement in bribery or corruption in any country in which Medix Biochemica conducts business. Medix Biochemica is committed to conducting all aspects of its business in keeping with the highest legal and ethical standards globally and to acting professionally, fairly and with integrity in all relationships. Medix Biochemica expects all persons working for Medix Biochemica and/or acting on Medix Biochemica's behalf to uphold these commitments. Medix Biochemica and its employees must not promise, offer or give bribes or any other illegal payments, directly or indirectly, to any government officials or other parties in order to obtain or retain business or for any other reason.
- The restrictions on giving gifts or hosting clients or other business associates do not preclude employee from engaging in "ordinary and usual business entertainment". In all cases, entertainment must not be so frequent, excessive or extensive as to raise any question of propriety. Medix Biochemica policies do not permit the use of business entertainment to provide incentives to conduct business with or through Medix Biochemica or third party in bad faith, in breach of trust or without objectivity.
- When in doubt as to the appropriateness of such hospitality and entertainment, employee must consult with employee's Manager prior to providing such hospitality or entertainment. In addition, special consideration must always be taken into account prior to providing any hospitality or entertainment to any public official.

As a Medix Biochemica Employee

- I take no part in bribery or corruption, when conducting business
- I do not offer or give bribes or any other illegal payments either directly or indirectly to any government officials or other parties in order to obtain or retain business
- I am reasonable when I am giving gifts or hosting clients and when in doubt, I consult my Manager

4. TRADE RULES

4.4 Anti-Money Laundering

- Money laundering and terrorist financing are potential threats to the operations, financial position and reputation of any business. Such activities are prohibited in Medix Biochemica. In addition, it is illegal to be involved in transactions with third parties who are dealing with the proceeds of criminal activity, individuals or entities who are themselves subject to or are located in countries that are the subject of sanctions (regarding products or services that relate to the business of Medix Biochemica), preventing Medix Biochemica from dealing with them or entities related to them.
- By following these general principles Medix Biochemica mitigates the risk of becoming involved in transactions that have a connection with money laundering, terrorist financing, counterparties that have links to organized crime or which would be in breach of sanctions.
- According to the law, money laundering means receiving, using, converting, assigning, transferring or transmitting or possessing funds or other property which employee know or suspect to be proceeds of crime, with the intention of covering or obscuring their illegal origin or assist the offender in avoiding prosecution. Assisting another person with any such activity also constitutes money laundering. Financing of terrorism involves collecting or providing funds to finance or knowing that funds are being used for financing of any terrorist activity.

As a Medix Biochemica Employee

- I take no part in money laundering or terrorist financing

5. DATA PROCESSING

5.1 Data Protection and Access to Information

- Medix Biochemica believes that protecting our customers' and business partners' privacy is crucial to our business and values. In the course of our business operations, we receive, collect, maintain, use and share personal data on customers and business partners. We are committed to protecting the privacy of individuals who visit our website, individuals who register to use our services and individuals who register to attend our corporate events and Medix Biochemica employees.
- Medix Biochemica fully endorses and adheres to the General Data Protection Regulation (GDPR) given by the EU Commission principles, which specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transporting and storage of personal data.

5.2 Patient Data Protection

- As a healthcare company, Medix Biochemica may have access to personal data in a healthcare context - known as patient data – which is very sensitive information. Medix Biochemica is committed to the protection of patient health information and compliance with applicable regulations concerning their use and disclosure.

As a Medix Biochemica Employee

- I am committed to protecting the privacy of individuals visiting our website, registering to use our services and those who attend our corporate events as well as Medix Biochemica employees
- I act according to the GDPR

6. MEDIX BIOCHEMICA PEOPLE WELL-BEING

6.1 Human Rights

- Medix Biochemica respects and promotes universal human rights as defined by the United Nations' Universal Declaration of Human Rights in its operations. Among those rights Medix Biochemica considers to be fundamental and universal the following: freedom of thought, opinion, expression, religion and peaceful assembly as well as freedom from any discrimination based on race, age, nationality, gender or sexual orientation.
- Furthermore, Medix Biochemica does not use nor tolerate the use of child labor or any working conditions that are not in accordance with international conventions, practices, and Medix Biochemica's own ethical standards.

6.2 Equal Opportunities

- Medix Biochemica is committed to promoting equal opportunities in employment. Employees and any job applicants will receive equal treatment regardless of race, sex, religion or belief, disability, sexual orientation, gender reassignment, marital or partnership status, military status, pregnancy or maternity, age or any other class or status protected by law. This policy applies to all aspects of employment with us, including hiring, placement, promotion, termination, redundancy, transfer, leave of absence, compensation and training opportunities.



6. MEDIX BIOCHEMICA PEOPLE WELL-BEING

6.3 Working Environment

- Medix Biochemica is committed to providing a safe working environment for all employees with consistent health and safety standards across our sites. As well as complying with local legal requirements, all sites are required to conform to relevant global best practice standards.

6.4 Conflicts of Interest

- A conflict of interest may occur when employee's private interest or activity interferes with the interests of Medix Biochemica or affects employee's ability to make objective decisions for Medix Biochemica. Conflicts of interest may also arise when a member of staff or their immediate family member receives some personal benefit (whether improper or not) as a result of their position within Medix Biochemica. Each individual's situation is different and, in evaluating employee's own position, employee will have to consider many factors.
- Employee must avoid conflicts of interest, or even the appearance of a conflict of interest between employee's personal and business relationships.
- If employee becomes aware of any material transaction or relationship that reasonably could be expected to give rise to a conflict of interest, employee should report it promptly to his/hers Manager.

As a Medix Biochemica Employee

- I abide to the human rights defined by the United Nations
- I avoid conflict of interest
- If a conflict of interest arises, I report promptly to my Manager



7. ENVIRONMENTAL POLICY

- At Medix Biochemica, we are committed to environmental stewardship and recognize our responsibility to minimize the environmental impact of our operations. We believe that sustainable practices are essential for the well-being of our planet and future generations.
- We comply with all applicable environmental laws, regulations, and standards. We commit to continually monitoring and adapting our practices to ensure ongoing compliance.
- In line with this commitment, we have established the following environmental policy:

We care!	Reduce, reuse, recycle!	Let's reduce our Carbon Footprint together!
<p>We prioritize ethically and environmentally responsible sourcing of raw materials, packaging materials, and supplies.</p> <p>We integrate environmental considerations into the design and manufacturing of our products with consistent quality, assisting our customers to reduce their carbon footprint.</p> <p>We increase chemical safety and biosafety by responsible choice of raw materials and manufacturing technologies. This commitment extends to collaborating with external partners to advance sustainable practices in our industry.</p>	<p>We strive to minimize our consumption of natural resources, including water and energy, by implementing efficient technologies and sustainable practices in our operations.</p> <p>We manage our waste responsibly by reducing, reusing, recycling, and properly disposing of waste materials. We seek innovative solutions to minimize the generation of waste in our processes.</p>	<p>We implement measures to reduce greenhouse gas emissions associated with our operations. This includes adopting science-based targets to mitigate our environmental footprint.</p>

- This environmental policy reflects our dedication to sustainable and responsible business practices.
- We communicate openly and transparently about our environmental goals, initiatives, and performance. This includes regular reporting to stakeholders on our environmental achievements and challenges.
- We encourage all employees to actively contribute to the implementation of this policy and embrace our shared responsibility for environmental biodiversity.

As a Medix Biochemica Employee

I am environmentally responsible in all my activities

8. COMMUNICATION, INTELLECTUAL PROPERTY RIGHTS AND USE OF COMPANY ASSETS

8.1 Confidential Information

- From time to time during the course of employment, Medix Biochemica employees may become aware of confidential information about the business affairs of Medix Biochemica or other companies with which Medix Biochemica has relationships. Employees shall maintain the confidentiality of all confidential information entrusted to them by Medix Biochemica or by persons with whom Medix Biochemica does business, except when disclosure is authorized or legally mandated. Confidential information includes all non-public information that might be of use to competitors, or harmful to Medix Biochemica or persons with whom Medix Biochemica does business, if disclosed.
- The confidential information learned or developed during the course of employee's employment is property of Medix Biochemica and may not be disclosed to any other party.
- Confidential information may not be used to advance any person or company's interest except that of Medix Biochemica, either during employment or after employee have left Medix Biochemica. Only Medix Biochemica determines who is entitled to possess or use such data, except when the law requires otherwise. Employee must return all confidential information or documents containing such information to Medix Biochemica upon the end of employee's employment.

8.2 Intellectual Property Rights

- Medix Biochemica employees are required to protect Medix Biochemica's intellectual property rights as well as respect the intellectual property rights of others.

As a Medix Biochemica Employee

- If I am entrusted with confidential information, I shall maintain its confidentiality
- I protect Medix Biochemica's intellectual property rights as well as I respect the intellectual property rights of others

8. COMMUNICATION, INTELLECTUAL PROPERTY RIGHTS AND USE OF COMPANY ASSETS

8.3. Use of Medix Biochemica assets

- The way Medix Biochemica protects its assets sends a signal to the public not only about standards of care but also about integrity. Medix Biochemica assets are to be used solely for the benefit of Medix Biochemica. Employee should protect Medix Biochemica's assets and promote their efficient use. Theft, carelessness, and waste have a direct impact on Medix Biochemica's profitability. All assets should be used for legitimate business purposes. In no event may Medix Biochemica's assets be used for unlawful or improper purposes.
- Medix Biochemica's assets are much more than our equipment, inventory, corporate funds and supplies. They include concepts, business strategies and plans, financial data, intellectual property rights and other information about our business. Each employee is personally accountable for the safekeeping, maintenance and proper utilization of Medix Biochemica's assets over which he or she has control and must protect those assets against both intentional and unintentional loss and damage.

As a Medix Biochemica Employee

- I protect the assets of Medix Biochemica and promote their efficient use
- I use the Company's assets to legitimate business purposes
- I am accountable in the safekeeping, maintenance and proper utilization of Medix Biochemica assets

9. VIOLATION OF THE CODE OF CONDUCT

- If an employee becomes aware of a breach or violation of this Code or any other Company policy, he or she must report the violations or suspected violations to the Medix Biochemica Group HR via Microsoft Forms <https://forms.office.com/Code of Conduct>
- All reports made via Microsoft Forms are made on confidential and anonymous basis. It is the policy of Medix Biochemica to prevent the occurrence of unethical or unlawful behavior and to halt such behavior as soon as reasonably possible after its discovery.
- Medix Biochemica will protect the anonymity of any reporting employee who so requests, as well as the confidentiality of matters associated with a report or investigation, to the extent possible in order to also be consistent with the Company's obligation to investigate reported matters and applicable law. Employees are also under a strict obligation to preserve the confidentiality of investigative matters.
- Medix Biochemica will take necessary steps to stop unlawful and unethical behavior and will take appropriate disciplinary action.

As a Medix Biochemica Employee

- If I became aware of a breach or violation of this Code of Conduct, I shall report it to HR via the link <https://forms.office.com/Code of Conduct>



Thank you

Medix Biochemica