



Medix Biochemica Suppliers Code of Conduct

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1. INTRODUCTION

- Medix Biochemica Group Oy and its subsidiaries (collectively, “Medix Biochemica”) 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 Supplier

- We always conduct our business activities in accordance with sound ethical principles
- We 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 suppliers are expected to maintain compliance with letter and spirit of all laws governing the jurisdictions in which they act. 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 supplier contract with Medix Biochemica and potential criminal and civil penalties. Suppliers have responsibility to comply with the laws and regulations related to their business area.

As a Medix Biochemica Supplier

- We maintain compliance with letter and spirit of all laws governing the jurisdictions in which we act
- We have responsibility to comply with the laws and regulations of our business area

3. BUSINESS BRANDING AND IMAGE

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

As a Medix Biochemica Supplier

- We do not damage the image and reputation of Medix Biochemica with our actions
- We 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 suppliers involved in international trade are 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 termination of contract with Medix Biochemica, as well as to the loss of import or export privileges.

As a Medix Biochemica Supplier

- We comply with all applicable laws, regulations and restrictions related to our activities
- We 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, suppliers 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 Medix Biochemica supplier must deal fairly with customers, service providers, 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 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 Supplier

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

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 the 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 suppliers to uphold these commitments. Medix Biochemica and its suppliers 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 customers or other business associates do not preclude employees 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.

As a Medix Biochemica Supplier

- We take no part in bribery or corruption, when conducting business
- We 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
- We are reasonable when giving gifts or hosting customers

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 and Medix Biochemica suppliers. 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 Medix Biochemica or Medix Biochemica supplier 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 Supplier

- We 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. The same is required from Medix Biochemica suppliers.
- 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. The same is required from Medix Biochemica suppliers.

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 its use and disclosure. The same is required from Medix Biochemica suppliers.

As a Medix Biochemica Supplier

- We are committed to protecting the privacy of individuals
- We act according to the EU GDPR, and any other related local regulation

6. 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. The same is required from Medix Biochemica suppliers.
- 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. The same is required from Medix Biochemica suppliers.

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. The same is required from Medix Biochemica suppliers.



6. 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. The same is required from Medix Biochemica suppliers.

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.
- Medix Biochemica and Medix Biochemica suppliers must avoid conflicts of interest, or even the appearance of a conflict of interest between employees' personal and business relationships.

As a Medix Biochemica Supplier

- We abide to the human rights defined by the United Nations
- We avoid conflict of interest



7. ENVIRONMENTAL SUSTAINABILITY POLICY

- Medix Biochemica is committed to promote environmental welfare and sustainability and complies with EU REACH and CLP regulations as well as local regulations related to production.
- Based on this commitment we adhere to the following principles:
 - We promote saving of natural resources by recycling, reducing consumption and minimizing waste
 - We take environmental aspects into account during product design phase
 - We encourage our personnel to environmental responsibility in all their activities
 - Medix Biochemica suppliers are required to commit to the same principles and actions.

As a Medix Biochemica Supplier

- We are environmentally responsible in all our activities



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

8.1 Confidential Information

- Medix Biochemica suppliers may become aware of confidential information about the business affairs of Medix Biochemica. Suppliers 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.

8.2 Intellectual Property Rights

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

As a Medix Biochemica Supplier

- If entrusted with Medix Biochemica confidential information, we shall maintain its confidentiality
- We protect and respect the intellectual property rights of others

9. VIOLATION OF THE CODE OF CONDUCT

- If a supplier becomes aware of a breach or violation of this Code, the supplier must report the violations or suspected violations to the Medix Biochemica Group through email info@medixbiochemica.com
- Medix Biochemica will take necessary steps to stop unlawful and unethical behavior and will take appropriate disciplinary action.

As a Medix Biochemica Supplier

- If we become aware of a breach or violation of this Code of Conduct, we shall report it to Medix Biochemica: info@medixbiochemica.com



Thank you

Medix Biochemica