



The Corza Code

DISTRIBUTOR CODE OF CONDUCT

Corza Medical Distributor Code of Conduct

Introduction

At Corza Medical, we are driven by the pursuit of excellence in surgical solutions and technologies. Our commitment, passion, and purpose unite us to deliver Remarkable Service, Trusted Performance, and Outstanding Value.

Equally important to our success is the way we conduct business. We are committed to operating with the highest standards of ethics, integrity, responsibility, and accountability. Every day, we follow both the spirit and the letter of the laws, regulations, and industry standards that guide our business.

We ground our business success in ethics and compliance. We have the courage to uphold the highest standards of business conduct and always do the right thing. With the Corza Code of Distributor Conduct, we require our valued distributors like you to share in these commitments. Along with the Corza Code for our company, the Corza Code of Distributor Conduct communicates clear expectations of how we should act every day and in every aspect of our work. By following the principles described here, we can achieve and exceed our business goals and maintain our global reputation as an ethical company. Corza reserves the right to update or amend this Code at any time, and distributors are expected to comply with the then-current version.

OUR VALUES

CUSTOMER FIRST

We deliver extraordinary experiences.

ACCOUNTABILITY

We do what we say.

INTEGRITY

We do what is right.

INSPIRED

We love what we do.

ONE GLOBAL TEAM

We before me, always.

Thank you for your continued partnership and professionalism. Together, we are building a stronger Corza and helping improve outcomes for patients around the world.

This Corza Code of Distributor Conduct (the “Code”) applies to all officers, directors, employees and representatives (including new employees and representatives at the time of hiring or engagement) and all relevant business partners, such as sub-distributors and agents. Each distributor is responsible for ensuring that its sub-distributors, agents, and other business partners comply with this Code.

Basic Principles of the Code

1. Do Business the Right Way, Every Day

Corza, along with all of our distributors, is committed to acting legally, ethically, and responsibly. This means following all applicable laws, rules, and regulations, as well as the Corza Code, policies, and procedures.

Everyone has a role in upholding these critical standards. Our distributors' employees and representatives are expected to understand the Code, follow it, and speak up if they become aware of a possible violation of the Code, a Corza policy, or the law.

2. Act Fairly and Honestly

We expect everyone to treat customers, suppliers, competitors, auditors, and other business partners fairly, honestly, and transparently.

This means not taking unfair advantage of anyone through manipulation, concealment, misuse of confidential information, misrepresentation, or other unfair practices.

It is also important to avoid conduct that could violate applicable antitrust or competition laws, including sharing nonpublic business information about pricing, costs, production, products or services, bidding practices, sales territories, or other competitively sensitive matters with competitors or other unauthorized parties.

Tender and bidding processes must be fair, transparent, and equal for everyone involved. Our distributors must not work with a tendering authority or any other relevant third party to create or interpret tender materials in a way that could give Corza an unfair advantage or compromise the fairness of the process.

3. Avoid Conflicts of Interest

A conflict of interest can happen when personal interests, relationships, or outside activities could affect—or seem to affect—decisions made for Corza or its distributors.

This could involve employees, directors, family members, customers, suppliers, government officials, healthcare professionals, healthcare organizations, physician-owned companies, or others connected to our work.

Everyone must avoid situations where personal interests may conflict with their responsibilities to Corza or its distributors. If there may be an actual, potential, or perceived conflict of interest, it must be disclosed promptly to Corza sales leadership or Corza's Chief Compliance Officer so it can be reviewed and managed appropriately.

4. Market and Sell Responsibly

We describe and promote our products and services accurately and honestly.

All promotional, marketing, and sales activities must follow applicable laws, regulations, and industry codes. Additionally, our distributors must use only marketing materials approved by Corza and/or any competent regulatory authority, where such approval is required under applicable law.

5. Keep Accurate Records

Accurate records help us run our business responsibly and maintain trust.

Our distributors must keep complete, accurate, timely, and reasonably detailed books, records, and accounts. Our distributors and their employees and representatives are expected to record and report business information truthfully and in line with Corza's policies. Corza reserves the right to audit or inspect such books, records, and accounts upon reasonable notice to verify compliance with this Code.

6. Do Not Make Improper Payments

Improper payments are payments, gifts, benefits, or anything of value offered or given unlawfully or with corrupt intent.

Distributor employees and representatives must never offer or provide cash, gifts, services, favors, or anything else of value to government officials, healthcare professionals, or others to gain an improper business advantage. This prohibition applies in compliance with all applicable anti-corruption and anti-bribery laws, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

This also includes payments of any size—sometimes called “facilitation payments”—intended to obtain or retain business or secure an improper business advantage, including by speeding up routine government or administrative processes. These types of payments are not allowed.

7. Work Appropriately with Healthcare Professionals and Government Officials

When we interact with healthcare professionals, healthcare organizations, government officials, or related parties, we do so professionally, lawfully, and for legitimate business reasons.

Any payment, meal, travel, service arrangement, or other benefit involving a healthcare professional, government official or other individuals involved in procurement, administration or decision-making related to healthcare products must be:

- Legal under applicable laws and regulations
- Supported by a clear, legitimate and documented business need
- Allowed under a written agreement
- Reasonable and appropriate in value and nature for the local market
- Consistent with the person's expertise, experience, and role
- In compliance with applicable local and regional industry codes

8. Communicate, Train, and Support Compliance

Owners, officers, directors, and managers are responsible for sharing the Code and helping employees, representatives, and relevant business partners understand what is expected.

Our distributors will provide their employees and representatives with appropriate training, including when they join the distributor. Distributor employees and representatives may also be asked to confirm in writing that they understand the Code, will follow it, and will report any concerns they become aware of.

9. Speak Up and Report Concerns

Please report any actual or suspected violation of the Code as soon as possible to Corza's Chief Compliance Officer or Corza's "Speak Up" hotline. Distributors have an affirmative obligation to promptly notify Corza of any known or suspected violation of this Code by any of their employees, representatives, or business partners.

Reports may be made anonymously where local law allows. Corza's distributors must not tolerate retaliation against anyone who raises a concern in good faith.

Not following the Code may lead to disciplinary action, up to and including termination of the distributor's employment relationships, and/or termination or suspension of the distribution agreement or business relationship with Corza, where appropriate.



Ask Yourself: Speak Up!

- Is this legal?
- Is this consistent with our Mission and Values?
- Does this comply with corporate and local policies, procedures and codes?
- Is this in the best interests of all our stakeholders?
- Would this reflect positively on Corza, and would I be comfortable if it became public?

Fair Treatment

Workplace Safety

Information Security

Insider Trading

Conflicts of Interest

Deceptive Marketing

Patient Welfare

Improper Gifts

Bribery & Corruption

Legal Compliance

Call to report anonymously:

844-600-0062

corza.com

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