

# Code of Conduct

## A Statement From Our Executive Chairman and CEO

Dear Corza Medical Colleagues:

Corza is committed to an unwavering pursuit of excellence in surgical solutions and technologies. Our commitment, passion and purpose unite us in delivering game-changing innovation to deliver Remarkable Service, Trusted Performance and Outstanding Value. Just as important to our business success is our commitment to conduct all our business activities in accordance with the highest standards of ethics, integrity, responsibility and accountability. Every day, we must follow the spirit and letter of the laws, rules and regulations that guide Corza and our industry.

We ground our business success in ethics and compliance. We hold constant and unwavering courage to uphold the highest standards of business conduct and always “doing the right thing.” That is why I ask each of you to take the time to read the Code and reiterate your commitment to our values of Customer First, Accountability, Integrity, Inspired and One Global Team. The Code communicates clear expectations of how we should act every day and in every aspect of our work. By following the Code and the principles contained in it, we can achieve and exceed our business goals and maintain our global reputation as an ethical company.

We have a great opportunity to provide transformative surgical solutions and technologies. But to truly achieve success, Corza must be known not just for being a great company, but also a good company—one where we are universally known as being responsible and ethical. As you read the Code, recognize our tremendous opportunity to dramatically impact and change the lives of millions of patients with our unwavering pursuit of excellence. Our success depends on a continued commitment to our values, and we must remain responsible stewards, acutely aware our reputation precedes us in everything we do, and our interactions must always make us an example for others to follow.

Thank you for your continued professionalism in making Corza the great company it is today, while we strive to create a better tomorrow for our patients around the world.

Sincerely,



Gregory T. Lucier, Executive Chairman and CEO



“We ground our business success in ethics and compliance. We hold constant and unwavering courage to uphold the highest standards of business conduct and always ‘doing the right thing.’ The Code communicates clear expectations of how we should act every day and in every aspect of our work.”

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# Using Our Code

## THE IMPORTANCE OF OUR CODE

Our Code establishes our shared values and principles that guide all Corza employees worldwide. It outlines our responsibilities to each other, to Corza, to surgeons, to patients, and to regulators. It also serves as the foundation for all our corporate policies and procedures. Our commitment to our Code helps ensure all aspects of our worldwide business are compliant with the highest financial, legal and ethical standards for our industry. It is critical for all of us to read, understand and follow the letter and spirit of our Code.

The high standards of conduct reflected in our Code apply to all employees, officers, directors and independent contractors of Corza and all its global subsidiaries and affiliates. In addition to conducting ourselves in a manner consistent with our Code, we must all comply with the laws, regulations and industry codes of the countries in which we conduct business. We also expect our distributors, sales agents, consultants and other third-party representatives to follow our Code, comply with laws and maintain the highest ethical and legal standards.

## OUR VALUES

Our commitment to ethical and lawful behavior is at the core of our Code. However, our Code goes beyond this commitment. Our Code also governs the way we interact with each other, our customers and the public, and it reflects 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.

## COMPLIANCE

We must be aware of and conduct all our business activities consistent with our Code, as well as all applicable corporate policies, laws and regulations of the countries in which we work or do business. Violations of our Code are taken seriously and will be investigated. Violations can result in disciplinary action that may include informal counseling, re-training, termination or reporting of criminal activity, when applicable.

## THE IMPORTANCE OF SEEKING GUIDANCE

Acting ethically and with integrity means always being truthful, accountable and doing the right thing — even when no one is watching. While this sounds simple, we know that the complexities of our business environment can sometimes make this difficult in practice. There are no shortcuts in doing what is right.

If you are faced with a decision and are unsure whether a particular activity would comply with the Code, ask yourself these key questions:

- *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 activity reflect positively on Corza, and would I be comfortable if this activity was publicly known?*

If the answer to any of these questions is “no” or “I’m not sure,” ask your manager or a representative of the Legal Department, the Chief Compliance Officer, or Human Resources for guidance.

## VOICE YOUR CONCERNS: SPEAK UP!

Have the courage to call out potentially illegal, unethical or even uncertain actions. It protects our patients, customers, coworkers, our personal and professional integrity, and the Corza reputation we all work so hard to build. You should feel encouraged to ask questions and empowered to express concerns made in good faith — i.e., with honesty, sincerity, and without malice. Good faith does not mean you have to be right, but it does mean that you believe you are providing truthful information.

If you become aware of a situation that may involve a violation of our Code or any applicable law or policy, you are required to report it promptly. Doing so may help us prevent illegal or unethical misconduct or may prevent a situation from escalating.

Failing to report potential violations can have significant consequences. Violating the Code, failing to report potential violations, withholding information about an actual or suspected issue or failing to cooperate in an investigation may subject you to disciplinary action, up to and including termination of employment.

All reports of misconduct are taken seriously. Each report is reviewed to confirm whether further investigation is warranted and to determine the appropriate response. Investigators strive to conduct each case with impartiality, respect, competence, honesty, fairness, timeliness, thoroughness and confidentiality. We respect the rights of all parties involved in potential misconduct and will handle all reports with discretion. No one is ever presumed to be guilty. When possible, based on legal restrictions, we will share with you whether your reported issue required an investigation and whether it was resolved.

There are many ways to seek guidance, ask questions or raise concerns. You can always ask questions or raise concerns with your manager or a member of our legal department, compliance officer or human resources.

Sometimes you may want to ask a question or raise a concern outside your department confidentially or anonymously. You may use any of the following channels to voice your concerns:

#### **Toll-Free Telephone (24/7):**

- **English speaking USA and Canada:** 844-600-0062
- **Spanish speaking USA and Canada:** 800-216-1288
- **French speaking Canada:** 855-725-0002
- **Spanish speaking Mexico:** 01-800-681-5340 (AT&T USA Direct)
- **All other countries:** 800-603-2869 (Please use appropriate country access code, or use the alternative reporting methods below.)

**A representative of Lighthouse will receive this call and guide you through this anonymous process.**

**Website:** [www.lighthouse-services.com/corza](http://www.lighthouse-services.com/corza)

**E-mail:** [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)  
(must identify Corza Medical)

**Fax:** +1-215-689-3885 (must identify Corza Medical)

You should feel free to ask questions or voice concerns through whatever method you find most comfortable for your situation, including anonymously. However, our ability to effectively investigate concerns raised anonymously is more limited.

Please do not raise concerns that you know are false or for the purposes of harassment or abuse. Employees who knowingly make false reports will be subject to disciplinary action.

## **NON-RETALIATION**

Corza Medical forbids retaliation against anyone who asks questions or voices a concern in good faith. Anyone who retaliates against someone who asks questions or raises concerns in good faith will face discipline, up to and including termination, regardless of that person's stature or position with Corza. Even calling into question an employee seeking guidance or raising a concern could be considered a form of retaliation as it may make the employee feel like they did something wrong by asking a question or reporting an incident.

If you feel you or another have been retaliated against, you should voice your concern through whichever channel above is most comfortable for you.

## **MANAGER RESPONSIBILITIES**

Managers and supervisors need to model and inspire ethics and integrity at work. We rely upon managers and supervisors to demonstrate a strong commitment to our Code, Values and Mission through their words and actions.

Managers and supervisors must also:

- Ensure compliance and promote personal accountability in others;
- Ensure that team members understand and meet their responsibilities to abide by the Code, company policies and procedures, and relevant laws and regulations;
- Include integrity and compliance as a factor when evaluating employees;
- Create an "open-door" environment where direct reports and other employees feel comfortable asking questions, voicing concerns or reporting perceived misconduct;
- Ensure employees, contractors or others who ask questions or voice their concerns are aware that the company will not tolerate any form of retaliation for doing so; and
- Raise questions or voice concerns through the appropriate channels, including their manager, compliance officer, or legal representative.

## **CONFLICTS**

The Code provides guidance regarding applicable laws and regulations where we operate; however, these laws and regulations are often complex and vary from country to country. If a conflict exists between the Code and a law or regulation, the most restrictive requirement applies.

# Our Responsibility to Each Other

At Corza Medical, we believe a truly exceptional company culture is built on a foundation of respect, diversity and inclusivity, and open communication. Our team members feel empowered to share their ideas, ask questions and contribute to our success, regardless of their role or background. By fostering a supportive and collaborative environment, we create a space where everyone can thrive and make a meaningful impact. Our commitment to excellence is rooted in our shared values, listening to customer needs and our dedication to patient outcomes.

## FAIR TREATMENT IN THE WORKPLACE

We are committed to creating supporting and celebrating diverse, inclusive and equal workplaces and communities. We believe our ability to fulfill our mission depends on having a diverse and inclusive workforce and capitalizing on our differing perspectives. We encourage the open sharing of opinions and ideas, and we value robust, respectful, fact- and science-based debate.

We maintain a fair and competitive work environment. Hiring, retention, promotion and other employment decisions should be based only on qualifications, merit and business needs and considerations, and not on age, race, color, creed, religion, gender (including pregnancy, childbirth or related medical conditions), sexual orientation, gender identity, mental or physical disability ancestry, national origin, citizenship, military or veteran status or any other characteristic protected by law. We respect the human rights, dignity and privacy of our employees. We must comply with the various laws regarding wages and working hours in the countries in which we work and do business, and we do not engage in child labor, forced labor or human trafficking.

We are committed to creating supporting and celebrating diverse, inclusive and equal workplaces and communities. We believe our ability to fulfill our mission depends on having a diverse and inclusive workforce and capitalizing on our differing perspectives.

## DEVELOPMENT

We are dedicated to attracting and retaining the best talent and helping employees achieve their full potential. We provide employees with support and training to help them meet their identified goals. We review our employees' performance periodically and strive to provide an environment and resources that support growth and development.

## WORKPLACE SAFETY AND WELL-BEING

We are committed to maintaining a safe, secure and healthy workplace. Each of us should report for work in a condition to perform our duties effectively and unimpaired by drugs or alcohol. If you have concerns about your drug or alcohol use, please contact our employee assistance program, a free confidential resource to help you and your family navigate various workplace and personal challenges.

We do not tolerate acts or threats of intimidation, abuse or violence. We do not allow weapons of any kind on our property. We do not tolerate harassment of any kind, whether verbal, nonverbal, physical or sexual. We recognize that harassment is not determined by the intent of the activity — instead, it is determined by the reasonable perception of the person who is targeted by or experiences the activity. In our work activities and interactions, we may not engage in racist, religious, gender or other stereotyping; derogatory jokes or gestures; physical or verbal conduct of a sexual, racist, suggestive or defamatory nature; physically or mentally intimidating acts; inappropriate jokes or humor; or communicating or displaying offensive material.

The health and safety of our employees, visitors and communities is a top priority. We strive to prevent workplace injury, illnesses, accidents and environmental releases by following all applicable laws, rules, regulations and policies in all the countries where we operate, conducting ourselves in a safe and responsible manner, taking all reasonable and necessary precautions in handling hazardous materials and operating equipment, and reporting any issues of concern we may discover.

## EMPLOYEE PERSONAL DATA

We respect and protect the confidentiality and privacy of our current, prospective and past employees. We must know and follow all employee data privacy and security laws around the world. We only access and process this information in compliance with laws, with consent where it is required, and if there is a legitimate, permissible business need.



# Our Responsibility to The Company

To enhance our commitment to the values of One Global Team, Inspired and Accountability, we owe Corza Medical certain key commitments.

## COMPANY ASSETS AND INFORMATION SECURITY

We have an obligation to protect all Corza Medical property, assets and confidential or proprietary information from theft, loss, misuse and waste. These items can be tangible items, such as office equipment, facilities and funds, as well as intangible items like proprietary information, inventions, ideas or data.

Proprietary information includes all non-public information, including confidential intellectual property, that might be of use to competitors or harmful to us, our business partners or customers if it is disclosed. Proprietary information should be accessed and used only for authorized purposes and should not be shared with anyone who does not have proper authorization and a business purpose for receiving it.

We must maintain technical systems and take administrative and physical security measures to safeguard our information systems so that they are kept secure from unauthorized use, damage or diversion. This means protecting our computers, mobile devices and information systems from cyber-attacks by complying with privacy and security policies, using encryption software (where appropriate) and notifying our information technology department if we suspect our systems may have been compromised.

## ACCURATE RECORDKEEPING

Accurate and complete records are crucial to our ability to comply with the law and for us to truthfully reflect to internal and external parties our financial health, product development and commercialization activities, regulatory and quality compliance, manufacturing processes and clinical studies. We do not record “off the books” funds, transactions or assets.

Records are the physical or electronic documents that we create as part of our work. We must ensure that all our records contain accurate and honest information that reflects the truth of the underlying transactions or events. No one should sign, approve or transmit a record, or permit another to sign, approve or

transmit a record on behalf of the Company, if he or she knows or has reason to believe the record is false or misleading. Records should be maintained or destroyed in accordance with our records retention policies.

## SPEAKING ABOUT THE COMPANY

We are committed to providing accurate and consistent information to customers, healthcare professionals (“HCPs”), government officials and others in the public domain, including social media. All written and oral communications intended for broad external audiences—including speeches, press releases, and presentations—must be reviewed by corporate communications and potentially other reviewers before issuance. To achieve this goal, only authorized people may speak on behalf of Corza. External inquiries about Corza Medical should be directed to the appropriate management and communications personnel. Likewise, our use of social media should be responsible, truthful, ethical and appropriate. Our social media activity should also be consistent with our advertising, promotion and media and communications policies and procedures.

## INSIDER TRADING

While working at Corza Medical, we may learn “inside information” about our customers, suppliers, partners and other companies. Insider information is information about a company not known to the public that a reasonable investor would consider important when deciding to buy or sell that company’s securities. We should not buy or sell the stock or securities of any other company, when we are in possession of material inside information about that company. In addition, we should not disclose such information to anyone else (including friends and family members) to enable them to trade on the information.





## CONFLICTS OF INTEREST

We should all be aware of any potential influences that may affect our loyalty to Corza, and we should avoid situations where personal interests conflict, or appear to conflict, with those of Corza. We make our business decisions based on substance and merit, not who we know, how we might individually benefit or how many favors we receive. For example, we should avoid significant personal investments in (or working for) a customer, supplier or competitor. We should not solicit gifts, entertainment or recreation for personal use. Likewise, we should not have any direct supervisory influence on the job evaluation, pay or benefits of any family member or anyone with whom we have a similarly close relationship. We should also avoid negotiating or overseeing a business transaction with such persons.

We must place our company's interests first when business opportunities arise in the course of our work or might be of interest or value to Corza Medical. If such a business opportunity arises, we must first submit the opportunity to Corza Medical, and we must not attempt to exploit the opportunity for ourselves.

## TRAINING

We believe continuing education and training contributes to our success and helps us comply with the complex laws, rules, regulations and guidelines that govern our business. Accordingly, all employees, distributors, sales agents and other representatives must complete ongoing training to, among other things, maintain high-quality products and processes and ensure compliance with our Code, our policies and applicable legal requirements in the countries in which we do business. Failure to certify and/or complete required and mandatory training in a timely manner may result in disciplinary action.

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# Our Responsibility to Others

Our core Values of Customer First, Integrity and Accountability drive us to engage with customers, suppliers, patients, HCPs and our markets with the utmost in consistency, transparency and truthfulness. We must fulfill a broad array of commitments to these key stakeholders to maintain our reputation and implement our Mission.

## SALES, MARKETING AND ADVERTISING

It is imperative that we accurately and truthfully represent our products and services at all times, and that we don't engage in any unfair, misleading or deceptive sales or marketing practices. Sales, marketing and advertising in this context is very broad and includes any information, training, programs or materials designed to inform our current or potential customers, patients, investors or media about our products or services. All these materials must be balanced, fair, objective, unambiguous and consistent with product labeling. Further, these materials should be approved through appropriate review and approval procedures consistent with our policies and the laws of the countries in which we do business.

Significantly, we must only market and promote our products for their approved uses (as determined by applicable regulators and government agencies).

Comments about, and comparisons to, our competitors' products must be fair, truthful, substantiated and in compliance with all laws and regulations. We should not disparage competitors' products, services or employees.

## SAFE, HIGH-QUALITY PRODUCTS AND SERVICES

Delivering extraordinary experiences for our customers demand a relentless focus on product quality, safety and efficacy. We are committed to developing and providing safe, reliable and high-quality products and services, and all employees, distributors, sales agents and other third-party representatives must comply with all applicable processes, procedures and policies designed to ensure the quality of our products. We all share the obligation to promptly raise any concerns regarding the quality of our products or services, or any ethical concerns about clinical treatment. We take complaints or possible adverse events seriously and will promptly communicate and investigate them consistent with the laws and regulations of the countries in which we do business as well as our core Values.

## RESEARCH AND DEVELOPMENT

We are committed to the highest quality research, development and data collection, and we must take the necessary steps to ensure the safety of the patients that may participate in clinical studies, as well as the security and privacy of the information provided to us. All such research and data collection must be carefully and accurately recorded, maintained and secured in a way that complies with data protection laws, and that enables accurate reporting, interpretation and verification.

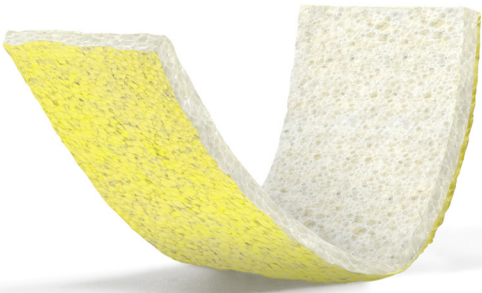
## RESPECTING PATIENTS AND THE PATIENT/PHYSICIAN RELATIONSHIP

We respect the relationships we have formed with our patients and customers, and the trust they have placed in us. We must, however, hold a greater respect for the relationship that exists between patients and their HCPs. This, too, is a relationship based on respect, collaboration and trust. Physicians have a moral, ethical, and legal obligation to put the patient's welfare ahead of their own self-interest. Patients have the right to expect this. At no time should our work compromise the integrity of the patient-physician relationship. We believe patients have a right to choose the product or therapy that best meets their individual need and disease state, even if this is not a Corza Medical product, and we respect their decision. We believe patients have a right to confidentiality, and we will safeguard their private information.

To be unsurpassed by our dedication, service and commitment, some of our employees fulfill a critical need by providing technical support for our products in various clinical settings. This includes educating HCPs in the application and use of our products and therapies and interacting with patients as appropriate under the direction and supervision of their healthcare provider. These employees must not engage in the practice of medicine.

While conducting our business, we often gain access to various types of personal information of patients. Similar to employee data privacy and security, we will access, use, transmit, store and dispose of their personal information in a safe and secure way, and in accordance with applicable laws and regulations.





## THIRD-PARTY RELATIONSHIPS

Our commitment to ethical conduct and responsible business practices extends to all distributors, sales agents, consultants and other intermediaries who act on our behalf or for our benefit—regardless of where they are located worldwide. We seek business partners who share our Values and our commitment to innovate surgical technologies that provide Remarkable Service, Trusted Performance and Outstanding Value. Each of them must read, understand, be trained on and certify compliance to our Code. It is important that we conduct reasonable and periodic due diligence to ensure that these third parties adhere to the standards in our Code and to the various laws, rules and regulations in the countries in which we do business.

## INTELLECTUAL PROPERTY RIGHTS

We often engage with other third parties to assist in the development, commercialization, manufacturing, supply and distribution of life-changing technologies. From time to time, we are also exposed to new ideas, innovations and technologies produced by competitors and others. Just as we seek to protect, enforce and enhance our own proprietary information and intellectual property, we will respect the proprietary information and intellectual property rights of third parties, including those of our employees' former employers.

## INTERACTIONS WITH HEALTHCARE PROVIDERS (“HCPs”)

We are committed to ethical and transparent interactions with the HCPs with whom we work, whether it be to support the effective use of our products and services and improve patient care, to develop innovative medical products or to support medical research and education. HCP interactions could include, for example, any meetings, speaking events, symposia, product promotion, research or educational events, or consulting agreements. In all such interactions, we must be aware of and comply with all applicable laws and regulations that govern relationships with HCPs in the countries in which we do business.

We must not enter into business arrangements, offer or provide any improper inducement (such as gifts) to an HCP to incentivize or reward the recommendation or use of our products or services. When engaging HCPs to provide services for the company,

we should make sure that we have a written contract in place providing for compensation (if any) that is no more than the fair market value for the relevant services, and we should be careful not to offer any payments or anything else of value to HCPs if it could constitute improper payment or a bribe.

## COMMITMENT TO HUMAN RIGHTS

It is important that we support and respect the protection of human rights in all our operations. Neither we nor our suppliers shall engage in any form of forced, indentured, slave or child labor, nor should employees be treated harshly or inhumanely. We are committed to preventing these practices in our operations and supply chain. Similarly, we follow applicable practices and laws regarding the disclosure of conflict minerals.

## GIFTS AND ENTERTAINMENT

While it can be common to exchange gifts and entertainment in many business situations, care should be taken to ensure that the giving of gifts or entertainment does not create a conflict of interest or otherwise violate the law, our policies or the spirit and intent of our Code. Business courtesies, such as meals and travel, may only be provided in accordance with our policies and procedures. We do not try to create business opportunities by offering meals, travel, entertainment, financial compensation or gifts as an improper inducement.

Moreover, stringent and complicated laws limit and/or prohibit gifts and entertainment provided to HCPs and government officials in the various countries in which we do business, and we must avoid gifts or entertainment for such individuals unless it complies with the requirements set forth in our policies.

## CHARITABLE AND POLITICAL ACTIVITIES

We are committed to giving back to the community and we encourage employees to participate in, and support charitable, educational and philanthropic organizations. Any charitable activities that we engage in as a company should be consistent with our mission.

Importantly, our support of charitable, educational or philanthropic organizations and causes must never be contingent on or related to the recommendation, use or purchase of Corza products or services. All charitable donations to an HCP or at the request of an HCP must follow our applicable policies and approval procedures.

Any public policy or political activities undertaken on behalf of Corza Medical (such as use of company funds, time or assets) must be consistent with the law and our Code, and pre-approved by our legal department. If we engage in civic or political activities on a personal basis, we must make it clear that our views and actions are our own, not Corza's.

# Our Responsibility to Regulators

While we always strive to comply with our Code, our business is heavily regulated by a complex network of laws, rules and regulations across the globe. We recognize these laws exist to further our industry's goal to create innovative new technologies, maintain high-quality, safe and effective products, ensure transparency and integrity of transactions, establish reliable manufacturing processes and create safe and welcoming workplaces. To act with Accountability and Integrity, we welcome to duty to honor the letter and spirit of these obligations.

## PREVENTING BRIBERY AND CORRUPTION

We are committed to complying with all anti-bribery and applicable anti-corruption laws in our business dealings and have a zero-tolerance policy for acts of corruption or bribery. We must not give, offer, solicit or receive any payments, services, entertainment or favors to obtain an improper business advantage. Anti-corruption laws are continually evolving in the countries in which we do business, and we must be careful to comply with local laws and regulations, as well as the spirit and intent of our Code when interacting with HCPs. We must also periodically review the conduct of our distributors, sales agents, consultants and other intermediaries to ensure their compliance. Any failure to comply can carry substantial liabilities for Corza Medical and even individual liability for perpetrators. Any suspicious activity in this regard should immediately be raised to our legal or compliance departments.

## COMPLIANCE WITH COMPETITION LAWS

We must not enter into agreements or business arrangements that are anti-competitive or that unfairly restrict trade. Any agreement that restrains trade may be a violation of anti-competitive laws in the countries in which we do business, regardless of who it involves. For these reasons, we should avoid inappropriately discussing sensitive, potentially anti-competitive topics with third parties, including: prices or pricing, output capacities, sales, bids, profits or profit margins, costs or methods of distribution. We should also refrain from obtaining any information about competitors through improper or unethical means. Similarly, we should not accept, disclose or use competitive information if there is reason to believe it was disclosed to us in breach of a confidentiality (e.g., by an employee who previously worked for a competitor company).

## INTERNATIONAL LAWS

We are a global company and we must comply with applicable laws, regulations, licensing requirements, boycotts, embargos and other restrictions that govern the exporting and importing of our products, services and technology in the countries in which we do business. We must provide accurate, truthful information about our products and other items to customs officials and other relevant authorities, and not participate in trade with sanctioned countries. We have adopted and implemented applicable compliance programs in the countries in which we do business.

## BILLING AND REIMBURSEMENT

We are committed to understanding and following all laws, regulations and guidelines that govern billing, collection or reimbursement of our products and services, and we may only bill for products and services that we believe are medically necessary. Likewise, we must keep complete and accurate records and recommend and/or use correct billing and reimbursement codes. It is important that we correct and report any substantive errors as soon as possible and raise any questions regarding unclear billing issues with a manager or other appropriate personnel to ensure that our billing-related activities comply with applicable law.

## INTERACTIONS WITH GOVERNMENT ENTITIES OR OFFICIALS

We must follow the same standards of ethical dealing with government entities that we follow for all our customers. Government officials may include employees of federal, state or local agencies, political candidates and employees of national or state-owned hospitals. It is important that we understand and carefully follow all laws, regulations and rules regarding giving or offering gifts, courtesies or entertainment to government officials.

It is our policy to cooperate fully with all government inspections and investigations. In the event you receive a request for an inspection, subpoena or notice of investigation, our general counsel or compliance officer should be notified so we may respond in a timely manner. In any event, we must not misstate, mischaracterize or omit any material information when communicating with the government, and we must ensure that all records provided to government entities are accurate, complete and timely.



# Ask This:

- 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 activity reflect positively on Corza, and would I be comfortable if this activity was publicly known?

# Speak Up!

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**