

# Code of conduct

## Sonesta Medical AB

---

Sonesta Medical is committed to conduct all our business with integrity and in an ethical manner with respect for human rights, labor rights, sustainability, anti-corruption and care for the environment. The purpose of this Code of Conduct is to ensure that all our employees and business partners operate in accordance with our standards and pursuant to internationally and nationally recognized standards, laws, guidelines and regulations. If the provisions of this Code of Conduct demand higher standards than those required by national laws, this Code shall prevail.

This Code of Conduct applies to all of Sonesta Medical's companies, board members, group management, managers and employees and to all business partners, including suppliers, subcontractors and customers of Sonesta Medical (individually hereinafter referred to as "Party" and collectively to as "Parties").

We are committed to high standards, and we expect all Parties to comply with these standards. All Parties are encouraged to report any deviations from this Code of Conduct via Sonesta Medical whistleblower function. Sonesta Medical does not accept any violations of the Code of Conduct and reserves the right to discontinue business partnerships where the Party seriously or repeatedly violates the Code of Conduct.

### **Laws and regulations**

The supplier shall always comply with applicable laws such as environmental legislation, competition rules, labour law, fiscal legislation and safety requirements, as well as other laws, regulations and provisions in the countries in which they operate.

### **Human rights**

All business conducted by a Party shall be conducted in a manner that is consistent and with respect to the internationally recognized human rights set forth in principles of the Global Compact and the International Bill of Human Rights.

Child labor and all kinds of forced or compulsory labor are strictly forbidden.

Personal data and disclosures should be handled in accordance with applicable laws and rules to ensure personal integrity.

### **Health and safety**

Sonesta Medical is committed to ensure a good working environment. National law and regulations regarding health and safety shall be applied strictly.

Safety and protective equipment shall be provided and used by the employees when needed.

All employees shall be informed about possible health hazards and receive necessary training regarding processes on health and safety in their area of work.

### **Labour rights**

Sonesta Medical is committed to an inclusive and diversified workplace with mutual respect between the employee and the employer.

Employees' fundamental right to decide to freely associate and be represented by labour unions, as well as an employee's right to refrain from joining a labour union shall be recognized.

Parties shall pay salaries and benefits in accordance with local applicable laws and, if applicable, local collective agreements and/or local industry norms. Parties shall strive for equal pay for equal work.

Any harassment, threats or discrimination due to race, sex, religion, ethnic background, disability, or sexual orientation shall not be tolerated.

## **Environment**

Parties shall comply with national legislation and strive for reduction in energy consumption and to reduce waste and emissions to air, ground, and water. Reduce and recycling of materials and products shall be applied. Hazardous waste shall be managed in a safe manner to minimize the risk of negative environmental impact.

Parties shall strive to measure and track environmental performance in terms of energy and resource efficiency, emissions, waste management and other applicable environmental impacts.

## **Anti-corruption and healthy competition**

All forms of corrupt conduct are strictly forbidden. Parties are prohibited from engaging in or accepting any form of corruption, both directly and indirectly, including bribery, receipt of improper gifts and entertainment, facilitation and protection payments, extortion, money laundering, and nepotism.

We have a zero-tolerance policy against corruption and bribery as defined in the UN Convention against Corruption. No offer, gift, consideration or benefit of any kind, which constitute illegal or corrupt practice, shall be made to anyone, either directly or indirectly, as an inducement or reward for the award or execution of any agreement between the parties.

All sales and marketing of our products and services shall be conducted in accordance with relevant laws and regulations in the country concerned. Any participation in cartels or other non-permissible cooperation with competitors, customers or suppliers are not accepted.

## **Political involvement and conflict zones**

Sonesta Medical is politically neutral. Sonesta Medical does not make political donations or become involved with political parties.

All Parties must ensure that no business is conducted in any way to supports war, conflict, extremism, money laundering, drug trade or slave trade. This includes not to violate any sanctions laws and regulations set forth by relevant authorities in the United States, the United Nations, the European Union including its member states, the United Kingdom.

## **Implementation and monitoring**

We expect that all sub-parties to the Parties, such as employees and subcontractors, are informed and comply with this Code of Conduct. The Code of Conduct shall be monitored by a Party as a natural part of day-to-day operations. A supplier is responsible for monitoring compliance at its subcontractors. The managing director of the subsidiaries in Sonesta Medical is responsible for informing their employees of this Code of Conduct and to ensure compliance.

Sonesta Medical reserves the right to confirm the Parties' and any subcontractors' compliance with this Code of Conduct, including through audits at the Parties' and through contact with the Parties' employees and subcontractors.

---

*Adopted by Management, September 2023*

*Pelin Sari*

---

Sonesta Medical AB  
Pelin Sari  
CEO