

CODE OF CONDUCT

2026







**BRIAN
LADUKE**

Chief Executive
Officer

HELLO,

Sarnova's mission is to be the best partner for those who save and improve patients' lives. As we continue to grow as a company and perfect the vision we have for Sarnova, we must never forget our values, which guide the way business is done, promoting acceptable, desirable and responsible behavior, above and beyond compliance with laws and regulations. From pharmaceutical distribution to medical device sales to product repairs and life-cycle management, our company values represent the highest standards we expect from our employees and the means by which we implement our guiding principles to achieve the highest standards of productivity, fulfillment and success.

The mission, vision, values and guiding principles of Sarnova represent the basic professional and ethical values of our company. This Code of Conduct expands upon those values and will help you better understand our commitment to our customers, their patients and the communities in which we operate.

Each concept outlined in this letter and more clearly defined in this Code are not only expected of our employees but also anyone providing products or services to Sarnova. The Sarnova Supplier Code of Conduct, which is sent to each of our suppliers and is often part of the supplier's contract, outlines the professional and ethical standards we expect all of our suppliers to meet. Carefully read through this Code of Conduct and keep a copy nearby. It serves as a great reference to raise concerns and always be your best.

Sincerely,

A handwritten signature in black ink, appearing to read "B. LaDuke", with a long horizontal line extending to the right.

Brian LaDuke
CEO

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PRINCIPLES
OF BUSINESS
CONDUCT

MISSION

1.1

MISSION

Be The Best.

Our mission is to be the best partner for those who save and improve patients' lives.

This is our purpose from an external vantage point. This is what we do. This is the overarching reason for our existence.

BEING THE BEST REQUIRES ACTING YOUR BEST

Employees of Sarnova are asked to be "The Best" - respect the law, work virtuously, and treat others professionally. We expect all of our employees to achieve this standard by knowing and following this Code of Conduct.

Sarnova adheres to the AdvaMed Code of Ethics, the industry gold standard in ethics for employees and third parties who have interactions with healthcare professionals or government officials.

WHO MUST FOLLOW OUR CODE?

- Employees
- Agents and Contractors
- Board Members
- Vendors



HAVE QUESTIONS? ASK HUMAN RESOURCES.

The folks in Human Resources are available to discuss our mission, vision, values and guiding principles.



VISION

1.2

VISION

Be The Best.

Our vision is simple; to be **the best** company in health and safety sales, service, and distribution.

This is the ideal state of our company from an internal vantage.



HOW CAN YOU HELP ACHIEVE THIS VISION?

Ask yourself this question and discuss the answers with your manager.



ESTABLISH PERSONAL GOALS!

Work with your manager to establish career goals that fulfill your aspirations and achieve Sarnova's vision.

VALUES

1.3

VALUES

Be The Best.

Our values guide the way business is done, promoting acceptable, desirable and responsible behavior, above and beyond compliance with laws and regulations.

This is a *high-level view* of what we believe in. This is the language we use to define our culture. This is how we measure right and wrong.

SERVICE

Providing value to our customers in everything we do.

INTEGRITY

Displaying strong character through honor, honesty, and doing the right thing.

ACCOUNTABILITY

Taking ownership of our results and putting in the hard work it takes to be the best.

RESPECT

Appreciating individual differences while demonstrating civility, politeness, and open dialog.

STEWARDSHIP

Controlling cost and maximizing benefit at every stage of the value chain.

TEAMWORK

Depending on each other for help and working together toward our common goals.

LEADERSHIP

Empowering our teams to succeed and demonstrating professional courage at all times.

EXCELLENCE

Dedicating ourselves to continuous improvement and getting better every day.

EMPATHY

Treating others with understanding and compassionate professionalism.



EXPERIENCING A CONFLICT OF LAWS AND VALUES?

The Compliance team within the Legal department is available to help you make ethical decisions within the law.



SEEK CONFIDENTIAL ASSISTANCE!

Your assistance and concerns will remain confidential.

Online: [Compliance Hotline](#)

Call: 866-593-6050

GUIDING PRINCIPLES

1.4

GUIDING PRINCIPLES

Be The Best.

Our guiding principles provide us with the guidance to achieve the highest standards of productivity, fulfillment and success.

This is a *ground-level view* of our cultural roadmap. This is how we operate. This is what shapes our actions, our interactions, and our daily work.

DO THE RIGHT THING.

We will always choose to do the right thing, even when shortcuts may seem easier.

PUT OTHERS FIRST.

We reach our goals by helping those around us reach theirs.

MANAGE THE BUSINESS.

We understand the necessity of healthy profits, and we are relentless about maximizing the sustainable, long-term growth of our company.

WORK WITH PASSION.

We take pride in aggressively pursuing excellence, and we wholeheartedly believe in what we do.

ALWAYS DO YOUR BEST.

We are never satisfied with being good, and we will always strive to be the best.

ENJOY YOUR WORK.

We surround ourselves with great people, and we find joy in helping each other become personally and professionally fulfilled.

CULTURE OF RESPECT.

We know that our differences make us stronger, and we are intentional in supporting the pursuit of each individual's full potential.



SET SMALL DAILY GOALS TO ACHIEVE BIG SUCCESS!

While most believe that having a long-term goal is crucial to success, successful people understand that without small, daily goals, you will get demotivated easily; success will in turn become hard.



WHAT ARE MY RESPONSIBILITIES?

Answer this question, then choose to live your work life according to these guiding principles.

PERSONAL ACCOUNTABILITY

1.5

PERSONAL ACCOUNTABILITY

Be The Best.

Simply stated, organizational culture is the way our teams think and act.

Our culture is one of personal accountability, and our thoughts and actions are guided by this mantra: See it. Own it. Solve it. Do it.

SEE IT.

Obtain the perspective of others; open and candid; asking for and offering feedback; hearing the hard things to openly see the reality of the situation.

OWN IT.

Being personally invested; learning from success and failures; ensure work is aligned with key results; acting on feedback that is received.

SOLVE IT.

Continuous improvement; collaborating cross-functionally; creatively dealing with obstacles; taking appropriate and necessary risk.

DO IT.

Doing what we say we will do; not blaming others; tracking progress with proactive and transparent reporting; building a culture of trust.

Personal accountability will transform a really good company into a really great one...an exceptional one that can be the very best!



ARE YOU HOLDING YOURSELF ACCOUNTABLE?

Personal accountability will transform a really good company into a really great one... an exceptional one that can be the very best!





HEALTHY
WORKPLACE
CONDUCT

EQUAL TREATMENT & NONDISCRIMINATION

2.1

EQUAL TREATMENT & NONDISCRIMINATION

Build Respect.

OUR COMMITMENT TO EMPLOYEES

Sarnova does not tolerate harassment, discrimination or other improper conduct in the workplace. To encourage employees to share responsibility for the performance and reputation of our company, we will:

- Only recruit, employ and promote employees based on qualifications and abilities.
- Never tolerate discrimination on any grounds, especially based on race, color, religion, sex and national origin.
- Provide equal opportunity based on merit.

FOSTER MUTUAL TRUST AND RESPECT. WORK HARD. BE KIND. BE PROFESSIONAL.

As an employee of Sarnova, you owe your colleagues and other people with whom the company does business professional courtesy and consideration during all daily activities. Therefore, you should never initiate or participate in:

- Racial, religious or other stereotyping.
- Derogatory jokes or gestures.
- Physical or verbal conduct of a sexual, racist or defamatory nature.
- Intimidating or aggressive acts.
- Inappropriate humor.
- Communicating or displaying offensive material in the workplace.



EQUAL EMPLOYMENT. EQUAL OPPORTUNITY. NO DISCRIMINATION.

It is the policy of Sarnova not to discriminate against any employee or applicant because of race, color, religion, sex, gender identity or sexual orientation, national origin, age, marital status, genetic information, disability, or because he or she is a protected veteran.

SAFETY

2.2

SAFETY

For a healthful workplace.

IT'S OUR POLICY AND THE LAW

Sarnova provides and maintains a work environment conducive to the health and safety of its employees, as required by the Occupational Safety and Health Act of 1970 (as amended) and other related state and local laws. Additionally, employees are expected to follow all of Sarnova's applicable health and safety policies and procedures.

What are your safety responsibilities as a Sarnova employee?

ANSWER: Sarnova expects that employees will make every effort to prevent workplace accidents if they are in a position to do so.

Please refer to the Employee Health and Safety Handbook for specific guidelines and policies.

What should you do if you see a safety or health hazard?

ANSWER: Immediately report the issue to your manager or the Compliance Hotline.

Online: [Compliance Hotline](#)

Call: 866-593-6050



HUMAN RESOURCES IS HERE TO OFFER HELP

Human Resources is available if you or a colleague are experiencing a safety issue in the workplace.

THREATS AND VIOLENCE

2.3

THREATS AND VIOLENCE

Zero-Tolerance Policy

PROHIBITED: PHYSICAL FORCE OR THE THREAT OF FORCE INTENDED TO HURT, DAMAGE, OR KILL

Sarnova maintains a zero tolerance policy for threats or acts of workplace violence.

What should you do if you observe or become aware of an act of workplace violence?

ANSWER: Report any type of threat or acts of violence as soon as possible to a member of management.

How will management respond?

ANSWER: Any threat or act of violence will be immediately investigated and addressed. Any employee who engages in an act of workplace violence or threatens to commit an act of violence may be subject to disciplinary action up to and including termination and may be referred to the appropriate law enforcement agency.

What can you do to help ensure your safety and the safety of your colleagues?

ANSWER: Never bring prohibited items to work.

Prohibited Items in the Workplace*

- Weapons of any kind.
- Illegal drugs.
- Alcoholic beverages not associated with a company event.
- Explosive materials of any kind.

** The workplace includes any company property, company vehicles, company sponsored events, or where otherwise performing or engaging in Sarnova job duties.*



HELP IS A CALL OR CLICK AWAY.

If you are aware of an unsafe condition, we can help!

Visit: [Compliance Hotline](#)

Call: 866-593-6050

SUBSTANCE ABUSE

2.4

SUBSTANCE ABUSE

No place in the workplace.

DRUG-FREE WORKPLACE

Sarnova is a drug-free workplace and requires all employees to report to work without any alcohol, or illegal, mind altering, or unauthorized controlled substances in their systems.

Employees should not come to work or perform any of their job duties while under the influence of any substance that impairs or may reasonably be expected to impair their ability to work safely in the workplace.

In limited circumstances, Sarnova may permit the consumption of alcohol at certain corporate sponsored events. However, never consume alcohol while operating equipment or conducting your daily work.



HELP IS A CALL OR CLICK AWAY.

If you are aware of an unsafe condition, we can help!

Visit: [Compliance Hotline](#)

Call: 866-593-6050

What substances are examples of substances that may impair your ability to work safely?

ANSWER: Illegal drugs, look-alike drugs and designer drugs are designed to impair your senses and are prohibited on company premises. Controlled substances and other prescribed or over-the-counter substances could impair your judgment. Please consult with your pharmacist or physician to determine if the legal drugs you are taking may impair your ability to operate equipment or perform your regular duties at work.

Can drug abuse or misuse outside the workplace affect my employment?

ANSWER: Yes! Outside conduct that affects an employee's work or an employee's relationship with other employees or the public, or which reflects badly on Sarnova, including the use, possession or sale of illegal or unauthorized controlled substances, is prohibited.



MANAGING
PROFESSIONAL
INTERESTS

CONFLICTS

3.1

CONFLICTS

Are you conflicted?

BOTH AT WORK AND IN YOUR FREE TIME, YOU SHOULD AVOID CONFLICT WITH YOUR RESPONSIBILITIES TO THE COMPANY.

All of us should avoid conflicts of interest and circumstances that tempt us to place our own interests or the interests of a third-party before Sarnova.

Conflicts of interest can occur in a variety of ways, however, the following situations can often produce conflicts of interest and should be carefully considered before proceeding:

- Doing business with family or close friends.
- Making charitable contributions on behalf of the company to a charitable organization affiliated with or recommended by a current or prospective customer or supplier.
- Hiring consultants, agents and other third parties with whom you have a personal relationship.
- Pursuing employment with a customer, vendor or supplier.



ARE YOU CONFLICTED? ASK YOURSELF THIS QUESTION:

“Is the action I’m considering going to create an incentive for me, or appear to others to create an incentive for me, to benefit myself, my friends or family, or an associated business at the expense of Sarnova?”

If the answer is “yes,” the action you’re considering will likely create a conflict of interest situation, and you should avoid it.



CONSULT WITH COMPLIANCE.

Before pursuing a potential conflict, complete a conflict of interest form and ask the Compliance team to make a determination whether a conflict of interest actually exists.

BUSINESS OPPORTUNITIES

3.2

BUSINESS OPPORTUNITIES

Avoid unfair dealing.

HONEST AND FAIR DEALING

We hire “The Best” individuals to help us create the best financial impact for Sarnova. We don’t hire “the connected” to facilitate deals that sacrifice performance or profits.

Every employee is expected to deal honestly with our customers, vendors, competitors and fellow employees. Advantages obtained through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practices should be uniformly avoided.

Do not engage in relationships and dealings with healthcare providers or government officials that confer benefits to the healthcare providers or government officials that could be perceived as a bribe. The scope of the value transferred or the benefit conferred should appear clearly in a contract or purchase order. For example, do not:

- Hire or contract with any immediate family member of a healthcare provider or government official to influence the healthcare provider or government official to use or buy our products or services or to obtain or retain business.
- Have any commercial dealings outside the business of the company with any healthcare provider, government official, entity or organization that is owned or controlled by a healthcare provider, government official or an immediate family member of a healthcare provider or government official.



THE COMPLIANCE TEAM HAS THE ANSWERS!

In all these situations, the rule is the same - if you haven’t talked to the Compliance team and are considering hiring or entering into a business relationship that involves a healthcare provider or government official, don’t. Compliance should be consulted.



CHANGING CIRCUMSTANCES?

Did one of your employees just marry the son of her greatest customer?

ANTI-CORRUPTION AND BRIBERY

3.3

ANTI-CORRUPTION AND BRIBERY

Compete fairly.

IMPROPER PAYMENTS

Receiving or requesting improper payments of any kind from a healthcare professional, government official or any other person is prohibited.

What is an Improper Payment?

ANSWER: Any financial payment or benefit offered or made to obtain or retain business or to gain an advantage unavailable by competitive means.

REMEMBER, an improper payment can include any of the of the following:

- bribes
- kickbacks
- gifts
- donations
- grants
- hospitality
- meals
- commissions

Cultural traditions or other laws and regulations do not supersede this Code.

- Even if improper payments may be seen by some as accepted business practice, DO NOT engage in such activity.
- Facilitating payments of any amount are prohibited.
- Engaging a third-party to complete an improper payment on your behalf is still prohibited.



DO YOU SELL TO A TEACHING HOSPITAL?

Be sure to report payments, ownership, investment interests and other transfers of value to physicians and teaching hospitals to Compliance.



BRIBERY MAY BE OCCURRING IF...

You are in the practice of:

1. offering, giving, receiving or soliciting
2. directly or indirectly
3. anything of value
4. to influence improperly the actions
5. of another party

MEALS

3.4

MEALS

Not a bargaining tool.

DRINKS AND REFRESHMENTS

You may provide a meal as a courtesy while conducting business, as long as you abide by the company's per diem limits and keep some basic guidelines in mind. For example, never provide meals to anyone if the intent of the meal is to induce action or gain or retain business.

The meal should be only nourishment to continue work and incidental to productive business. Regardless of intent, a meal should not bear any appearance of an intent to induce an action. To avoid the appearance of an inducement keep the meal:

- Modest in value.
- Not a routine expense.
- Apart from any entertainment or recreational event. - Shared in a setting conducive to achieve a business goal.

Other meals to avoid paying for include those:

- For an entire office staff when only a few individuals are necessary participants in the business meeting.
- For family, friends or guests of any healthcare provider or government official.
- Meals you or someone from the company will not attend.

For guidance on meals you may organize or attend for business, consult with the Compliance team.



IS THE MEAL INTENDED TO INDUCE ACTION?

You should not pay for any meal if doing so will obligate, appear to obligate or is intended to obligate or unduly influence the behavior or decision making of a healthcare provider, government official, or other individual.

GIFTS AND ENTERTAINMENT

3.5

GIFTS AND ENTERTAINMENT

Compete with integrity.

ACCEPTING OR SOLICITING ITEMS OR EXPERIENCES OF VALUE

Sarnova employees are strictly prohibited from accepting or soliciting any type of gift, gratuity, favor, entertainment, reward, etc., from a vendor of medical products or from a customer. Similarly, Sarnova employees may not give healthcare providers any type of non-educational branded promotional items, even if the item is of minimal value and related to the healthcare providers work or for the benefit of patients.

ACCEPTING GIFTS AND ENTERTAINMENT

Industry Rule: Accepting gifts or entertainment from anyone in the medical industry including government officials is not permitted.

Be Careful: Gifts, entertainment, and other courtesies from a healthcare provider, government official, competitor, vendor or customer create a conflict of interest or the appearance of a conflict of interest.

What about non-medical vendors?

Generally, acceptance of inexpensive “token” non-cash gifts from vendors not related to the medical products industry is permissible.

GIVING GIFTS AND ENTERTAINMENT

Unless an item is educational, gift-giving is prohibited. Similarly, providing entertainment such as golf outings or vacations is also strictly prohibited. Any requests to provide a customer with a gift, donation, or other item of value must be approved by management and the Director of Sustainability & Compliance.”

What items are educational?

- The item must benefit patients or serve a genuine educational function.
- Be incapable of non-educational functions.
- Not exceed \$100 in value.

NEVER give anything of value to government officials to influence official action or to secure an advantage.



WHAT ABOUT DISCOUNTS AND REBATES?

Any incentive program, discount, rebate, or committed-use deal must be approved by Legal before being offered to a customer.



YOU MAY NOT GIFT AN IPAD

with the latest edition of “Emergency Medical Services: Clinical Practice and Systems Oversight.”

ANTI-TRUST

3.6

ANTI-TRUST

Compete with integrity.

PROMOTE MARKETPLACE COMPETITION.

Anti-trust laws prohibit agreements or arrangements between competitors that affect fair competition. Avoid discussing sales practices, contract terms or marketing strategies with a competitor as such conversations could be construed as anti-competitive.

Situations with competitors you should avoid:

- Discussing any conditions, discounts, promotions or pricing information related to a bid.
- Agreements to set specific pricing or even minimums or maximums.
- Arrangements that award bids or contracts based who is the “next in line.”
- Allocating market share or specific customers to competitors.
- Fixing pricing or conditions for sale or resale.

Competitive practices to avoid:

- Drawing a distinction between our product and those of our competitors without a factual basis to do so.
- Manipulating, concealing or abusing privileged information to gain an advantage over a competitor.
- Misrepresenting materials facts.

BEHAVIOR THAT COULD BE A VIOLATION OF ANTI-TRUST LAWS

- Grabbing drinks with a competitor at a trade show and discussing market dynamics.
- Calling a competitor to discuss how to respond to a request for a proposal or a bid.
- Asking a competitor not to submit a bid or quote for an existing or potential customer.



ANTI-TRUST PHRASES TO AVOID:

Avoid using anti-trust “buzz words” and phrases such as:

- UNCONTESTED MARKET LEADER
- REMOVE THE COMPETITION
- DOMINATE THE MARKET
- CRUSH THE COMPETITION
- WE ARE IRREPLACEABLE
- NO ONE CAN BEAT US

These phrases should be avoided in conversations, and should not be included in marketing materials, bid documents, sales pitches, internal presentations, written agreements, etc.

POLITICAL AND CHARITABLE DONATIONS

3.7

POLITICAL AND CHARITABLE DONATIONS

Giving responsibly.

POLITICAL AND CHARITABLE GIVING

The company may make contributions or donations for political, educational, charitable or humanitarian purposes in line with all applicable domestic and international laws and regulations:

- The donation is infrequent and reasonable in amount under the circumstances.
- The donation has been approved by management and the Director of Sustainability & Compliance.”

Donations to private charities should not be made in the name of a government official, as a donation to an official’s favorite charity could be viewed as a bribe.

This policy is not intended to discourage personal political and civic participation outside of work.

DONATE IF

- The donation is directly to a bona fide charitable organization or government agency as part of a charitable effort or to promote goodwill.
- There is no expectation that the donation is given in exchange for any return favor or business advantage from the charity or government (quid pro quo).
- The donation is not made directly to an individual government official, and there is no indication that the donation will be redirected to an individual official’s personal use.



IT’S PROBABLY NOT CHARITY IF IT CONTRIBUTES TO OUR BOTTOM LINE.

Grants or Donations should not be connected with any past, present or future purchases of our products or services.



Charity is its own reward, and should not be used to encourage any customer to conduct business or provide service. Grants or Donations should not be connected with any past, present or future purchases of our products or services.

INTERNATIONAL TRADE

3.8

INTERNATIONAL TRADE

Sales and Shipping Restrictions.

IMPORT AND EXPORT REGULATION

Sarnova aims to promote fair and safe international trade by complying with laws that regulate how, when and where we can import or export the products we sell. These complex laws often require coordination between multiple departments to properly comply with licensing, record keeping, embargoes and boycotts. For assistance, contact the Regulatory department.

Why is it important to screen international orders?

- To prevent sanctioned countries, entities or persons, in particular those associated with terrorist activity, from obtaining items that could be used to help commit crimes, atrocities or other prohibited end-uses.
- To fulfill contractual agreements with our suppliers that place restrictions on how we can move products across country boundaries and may prohibit us from doing business with certain countries, companies or individuals.
- As a company headquartered in the United States, all employees, agents and subsidiaries (even if located in another country) must comply with U.S. and local trade laws.





CORPORATE ASSETS

FINANCIAL RECORDS

4.1

FINANCIAL RECORDS

Timely, regular, reliable and clear information.

REPORTS, STATEMENTS, ADJUSTMENTS

Sarnova is committed to maintaining accurate accounting records, consistent financial reports and effective internal financial controls. Our accounting records and supporting documents are designed to accurately describe and reflect the true nature of our underlying transactions and conform to applicable accounting standards.

- You must never falsify or disguise transactions or records (e.g. expense reports, sales data, timesheets).
- Ensure the way you manage documents does not create security issues (e.g. sharing information with inappropriate individuals).
- Documents should be retained and/or destroyed according to internal policies or as specified by law.
- Relevant documents must be preserved if you become aware of a Legal request for such documents or if a litigation hold has been issued by the legal department.
- You are expected to be familiar with the specific document retention requirements relative to your position.



CONFIDENTIAL INFORMATION

4.2

CONFIDENTIAL INFORMATION

Proprietary information and trade secrets.

WHAT WE KNOW STAYS PROTECTED.

You should only access or disclose the company's confidential information if you are authorized to do so as part of your employment. Never exploit the confidential information of any kind for personal gain.

Sarnova will vigorously protect and considers confidential all records related to:

1. information proprietary to vendors and customers.
2. employee records (e.g., disciplinary actions, performance evaluations, personal information such as home address and telephone number, marital status, sexual orientation, number of dependents, information in personnel or medical files, etc.).
3. the contents of regular or electronic mail.
4. trade secrets and company records (e.g., policies and procedures; internal memos and communications not intended for public consumption; financial and statistical information and records; business plans; marketing plans; any information covered under the HIPAA regulations).

You also have a duty to respect the confidential information of our competitors. Do not use confidential information relating to other organizations, if there is a reason to believe it was obtained improperly.



THREE TAKEAWAYS TO ENSURE INFORMATION SECURITY:

- 1 Properly secure, label, and (when appropriate) dispose of confidential information.
- 2 Safeguard confidential information that Sarnova receives from others under nondisclosure agreements.
- 3 Take steps to keep our trade secrets and other confidential intellectual property secret.

DATA PROTECTION

4.3 DATA PROTECTION

Security and
privacy of
Personal Data.

USING, SAFEGUARDING AND SHARING DATA

Sarnova is committed to protecting the Personal Data of employees, customers, and business partners. Reasonable and appropriate security measures will be taken to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction.

An employee's access to Personal Data will be restricted to what that employee needs to preform his or her job.

If granted access to Personal Data, each such employee bears a personal responsibility for ensuring Personal Data (e.g. name, address, telephone number, e-mail address or payment information) is not unlawfully or unnecessarily collected, used or disclosed. Such responsibilities include, but is not limited to:

- Before collecting Personal Data, you are expected to confirm the collection of such information is permissible. You should also ensure notices required to be provided are actually given to the individual whose Personal Data is being collected.
- Your access to Personal Data needs to be limited to what is required as part of your job duties and, even then, only after your supervisor has given permission.

- Do not use Personal Data for personal reasons. Keep your use of Personal Data strictly to the business purpose for which it was collected.
- Disclosing Personal Data to a third party should only occur when consistent with company policy and when the third party has agreed in writing to adhere to Sarnova's policy on the use and disclosure of Personal Data.

All employees, regardless of whether you have been granted access to Personal Data, have a duty to report any unauthorized collection, use, and/or disclosure of Personal Data.

WHAT IS PERSONAL DATA?

Personal Data relates to the identity of a person.

This could be as simple as a name, phone number, IP address or a cookie identifier, or other factors. In some cases this can include an individual's business contact information.

If it is possible to identify an individual directly from the information you are collecting, using or disclosing, then that information may be Personal Data.



YOUR RESPONSIBILITY WHEN HANDLING PERSONAL DATA

Everyone has a duty to take reasonable precautions to limit the disclosure of personal data, even if you mistakenly received personal data.



REPORT DATA BREACHES!

Failure to report data breaches or failure to comply with this policy may result in discipline up to termination.

Visit: [Compliance Hotline](#)
Call: 866-593-6050

SOCIAL MEDIA AND ELECTRONIC COMMUNICATION

4.4

SOCIAL MEDIA AND ELECTRONIC COMMUNICATION

Exercise caution.

E-MAIL, TEXTS, SOCIAL MEDIA, ETC.

Generally, all electronic communications while at work should be limited to the scope of your position. However, we recognize some personal use may be necessary. Personal electronic communications using company devices should be limited and must not interfere with your daily responsibilities or productivity while at work.

When you use electronic communication devices, communicate over electronic networks or discuss company subject matter, you must comply with the all the other sections of this Code of Conduct. This expectation applies whether you are working in the office or remotely. Such communications are to remain respectful, responsible and professional in tone so as to not violate this Code and all applicable policies.

You are strictly prohibited from transmitting, viewing, generating, printing, retrieving, downloading or storing any communication of a discriminatory, defamatory, obscene, damaging (such as viruses or spamware), threatening or harassing nature, or any material that is inappropriate for the business environment (such as sexually oriented pictures, or unproductive rumors).

Finally, unless you are authorized to do so, you may not publicly comment, post or speak using social media or other electronic communication on behalf of Sarnova or any of its subsidiaries, or disclose confidential, proprietary, restricted, internal or personal information that is not publicly known.





CORPORATE
SUSTAINABILITY

OUR APPROACH TO SUSTAINABILITY

5.1

OUR APPROACH TO SUSTAINABILITY

Introduction.

CREATING LONG-TERM VALUE.

At Sarnova, we view corporate sustainability as essential for creating long-term value. We play a critical role in ensuring the safe, ethical, and efficient delivery of products that support patient health and well-being. Our sustainability approach is grounded in a commitment to conducting business responsibly, transparently, and with respect for all stakeholders across our value chain.

We are guided by the United Nations Global Compact Ten Principles, which serve as the foundation of our sustainability framework. These principles—focused on Human Rights, Labor, Environment, and Anti-Corruption—inform our decision-making, policies, and day-to-day operations. By integrating these principles into our corporate culture and governance structures, we aim to improve business outcomes and operational efficiency while decreasing negative environmental and social impacts.

Our sustainability priorities focus on:

- **Corporate Governance and Ethics** – incorporating ethics and compliance into all aspects of our business.
- **Environment** – minimizing our environmental impact with regard to emissions, waste, energy and resource use.
- **Sustainable Supply Chain** – considering our suppliers' environmental and social impacts in our sourcing decision-making process.
- **People** – enhancing the well-being of our employees, customers, and product end-users.



CORPORATE GOVERNANCE AND ETHICS

5.2

CORPORATE GOVERNANCE AND ETHICS

Our Priorities.

SUPPORT DECENT AND RESPONSIBLE BUSINESS PRACTICES.

Strong corporate governance and a culture of integrity are foundational to Sarnova's sustainability efforts. Operating in the highly regulated healthcare industry, we recognize that ethical conduct and transparent decision-making are essential not only to regulatory compliance, but also to maintaining the trust of our customers, suppliers, partners, and patients.

We are committed to upholding the highest standards of business ethics, in alignment with the UN Global Compact Principle on Anti-Corruption, and to embedding accountability and integrity into every level of our organization. Our approach to governance and ethics includes:

- This **Code of Conduct** that sets expectations for ethical behavior by employees, management, and third parties, including adherence to anti-bribery, anti-corruption, antitrust and fair competition, and conflict of interest policies;
- **Clear governance structures**, with defined roles and responsibilities for oversight of sustainability, compliance, and risk management;
- **Training and awareness programs** to ensure all employees understand their ethical responsibilities and can identify and report misconduct; and
- **A confidential whistleblower mechanism** for employees and external stakeholders to report suspected violations without fear of retaliation.

Maintaining strong governance and ethical standards supports our sustainable business growth efforts, mitigates risk, and reinforces our commitment to responsible corporate citizenship.



ENVIRONMENT

5.3

ENVIRONMENT

Our Priorities.

ENVIRONMENTAL RESPONSIBILITY STARTS HERE.

Sarnova is committed to minimizing our environmental impact and advancing sustainable practices across our operations and supply chain. Initiatives focused on the environment are essential to reducing our ecological footprint, ensuring sustainable resource use and compliance with environmental regulations. Our environmental strategy focuses on the following key areas:

- **Reduction of Greenhouse Gas**

Emissions: We are actively working to reduce our Scope 1, 2, and 3 greenhouse gas (“GHG”) emissions through the following ambitious targets, which are in line with the Paris Agreement:

- By 2030, we will reduce our aggregate Scope 1 and Scope 2 GHG emissions by 50%.*
- By 2030, 60% of our COGS suppliers with at least \$1 million of spend will have their own Scope 1 and Scope 2 GHG emissions targets..
- By 2030, 60% of our private label Curaplex® suppliers will have their own Scope 1 and Scope 2 targets.

- **Circular Economy and Waste Reduction:**

We apply circular economy principles to our waste management practices. This means prioritizing reuse, recycling, and material recovery before disposing of products and packaging. Within our own operations, we have set the following target:

- By 2028, 100% of Sarnova’s warehouse waste will be diverted from landfills through the use of recycling, reuse, or waste-to-renewable energy incineration.

- **Resource Efficiency:**

We seek to manage our use of natural resource with the goal of reducing consumption and increasing operational efficiency. While our efforts in this area are at an early stage, we are committed to expanding and strengthening our approach in the coming years. As part of this commitment, we will also support the increased use of renewable energy sources in our operations where feasible, as a means of reducing our environmental impact and supporting long-term sustainability.

* Scope 1 and 2 reduction target is based on 2022 baseline data



SUSTAINABLE SUPPLY CHAIN

5.4

SUSTAINABLE SUPPLY CHAIN

Our Priorities.

DRIVING SUSTAINABILITY ACROSS OUR NETWORK.

Much of Sarnova's environmental and social impact lies in our upstream supply chain. Because of this, we believe that responsible sourcing and ethical supply chain practices are essential to delivering sustainable value to our customers, partners, and the medical communities we serve. Sarnova works with a diverse network of suppliers, and we are committed to ensuring that our supply chain upholds high standards of social, environmental, and ethical conduct.

Our sustainable supply chain strategy focuses on our Supplier Code of Conduct, where we require each of our suppliers to adhere to the following core commitments:

- **Labor Standards and Child Labor:**
We expect all suppliers to uphold internationally recognized standards, including the prohibition of forced labor and child labor. We seek to partner with suppliers who promote fair wages and safe working conditions.

- **Human Rights:** Sarnova assesses suppliers for potential human rights risks and engages in supplier due diligence processes to identify, prevent, and mitigate adverse impacts. We seek to partner with suppliers who share our commitment to human dignity, fairness, and non-discrimination.
- **Anti-Corruption, Fraud and Abuse, and Anti-Trust:** Ethical business conduct is non-negotiable to Sarnova. We expect our suppliers to comply with all applicable anti-corruption, and anti-trust, and Federal fraud and abuse laws related to healthcare. This includes refraining from any form of collusion, price-fixing, or unethical competitive practices.



PEOPLE

5.5

PEOPLE

Our Priorities.

OUR PEOPLE, OUR PURPOSE.

Our employees and the communities that we serve are at the center of Sarnova's success. We are committed to fostering a safe, inclusive, and respectful workplace while delivering value, quality products and services, and a positive experience to our customers and end-users. Our approach balances internal employee well-being with our external responsibility to promote public health and community trust through the products and services we provide.

For Our Employees:

- We are committed to maintaining a **safe, healthy, and respectful work environment** where all individuals are treated with dignity and fairness. This includes a focus on work-life balance, health and safety in our facilities, and adequate wages for all employees.
- We promote and encourage a **workplace culture where different perspectives are valued** and opportunities are accessible to all.
- Our workplace policies and practices support **employee engagement, retention, development, and well-being**.

For Our Consumers and End-Users:

- We prioritize **end-user health and safety** by ensuring the products we distribute meet all regulatory standards and internal quality requirements.
- We focus on the **user experience and value** of our products, striving to meet the evolving needs within the healthcare industries we serve through reliable, efficient, and accessible solutions.
- We are committed to **promptly addressing and remedying customer concerns or issues**, ensuring that the problems are resolved effectively.
- We are dedicated to **protecting all customer, end-user, and business information** by maintaining responsible data privacy and cybersecurity practices designed to safeguard sensitive information and maintain trust.



REPORTING
CONCERNS

WHEN TO REPORT

6.1

WHEN TO REPORT

Consider the issue and take responsibility.

DO YOU HAVE AN OBLIGATION TO REPORT?

If you become aware of questionable or illicit conduct that may violate this Code of Conduct, you should immediately report it to your supervisor or to Sarnova's Compliance Hotline.

In these instances, ask yourself: does this feel right? Are our company's core values being violated? How would the conduct in question be perceived if it were to be made public in the news?

This is your company, and we want you to speak up and not tolerate something that is, or appears to be, unethical or illegal.



VISIT OR CALL THE COMPLIANCE HOTLINE.

Go online or dial the number below.

Visit: [Compliance Hotline](#)

Call: 866-593-6050



HOW TO REPORT

6.2

HOW TO REPORT

Consider the issue and take responsibility.

IN-PERSON OR ANONYMOUSLY

If you have a question or concern about this Code of Conduct or believe that someone may be violating it, do not hesitate to discuss these issues with your supervisor. Sarnova is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable approaching a manager or anyone in leadership in instances where you believe violations of policies or standards have occurred.

If a discussion with your manager is too uncomfortable or you prefer to report anonymously, you may do so through our Compliance Hotline:

Online: [Compliance Hotline](#)

Call: 866-593-6050

Employees may report in confidence, and the company will use its best efforts to maintain the anonymity of the employee making the report. We will not allow retaliation against any employee who, in good faith, reports a concern.



VISIT OR CALL THE COMPLIANCE HOTLINE.

Go online or dial the number below.

Visit: [Compliance Hotline](#)

Call: 866-593-6050

RETALIATION

6.3

RETALIATION

Protect whistleblowers.

NO RETALIATION!

Sarnova prohibits retaliation against any employee who reports or participates in an investigation of a possible violation of our Code, policies, or the law. If you believe you are being retaliated against or know someone who is, please do not hesitate to notify Human Resources, the Legal Department or anyone in management. You may also seek assistance through the Compliance Hotline.

Employees should feel comfortable reporting ethics or compliance violations without fear of retaliation. Otherwise our mission, vision and values are at risk, which places the financial health of our company in peril. We maintain our confidential Compliance Hotline.

Online: [Compliance Hotline](#)

Call: 866-593-6050



HUMAN RESOURCES IS HERE TO SUPPORT YOU.

Report retaliation.

Protect victims.

Do not let others discourage
you from doing what is right.

