

Trudell Medical Limited

Code of Business Conduct and Ethics

ADOPTED BY THE BOARD OF DIRECTORS ON JUNE 24, 2025

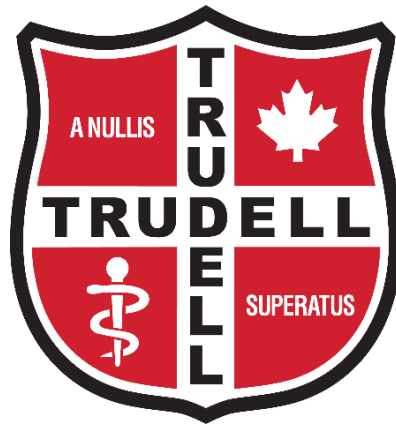


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MESSAGE FROM THE EXECUTIVE CHAIR

To all Board Directors, Officers and Employees:

We are passionate and proud about patient safety and developing, producing and delivering high quality, innovative and cost-effective healthcare products and services that make a positive difference in patients' lives worldwide.

Our success in achieving our goals is tied to a corporate culture rooted in our six core values:

1. Respect

We treat everyone in a dignified manner, as they would want to be treated. We believe in diversity and respect for all. We value each other's points of view and keep an open mind to being wrong.

2. Integrity

We are honest and ethical and have the courage and conviction to do the right thing, even when no one is watching. Acting with integrity is a choice we always make.

3. Trust

We build trust through honesty, transparency and fairness. Trust is based on what we do, not on what we say.

4. Duty

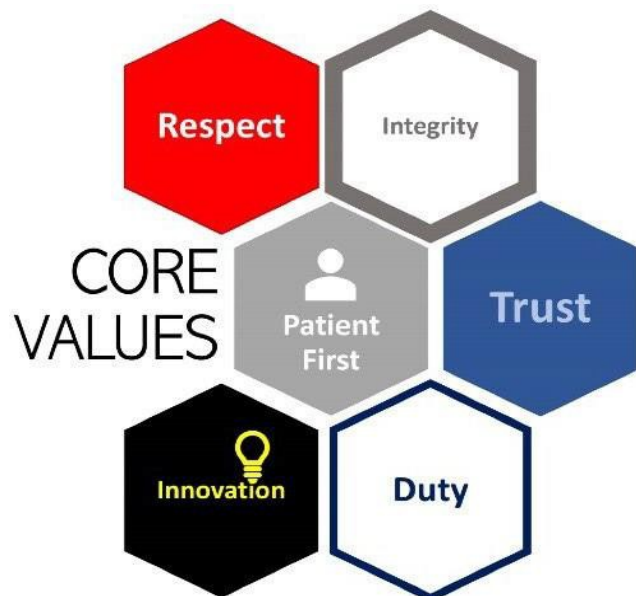
We are loyal and driven to be the best at what we do. Duty is responsibility and accountability. Deliver on your goals and objectives. Get the job done. Do it safely and ensure the safety of others. Do it in an environmentally responsible way that helps protect our planet.

5. Patient First

Serving patients and their caregivers is a privilege. We earn that privilege by understanding their unmet needs, delivering solutions that improve quality of life, and keeping safety our priority.

6. Innovation

We act on opportunities to do things better and turning problems into solutions. We keep an open mind and encourage creativity through diversity of thought. We have intellectual curiosity and a passion for solving problems. Innovation is not limited to our products. It encompasses everything we do and is essential to our competitiveness. Innovation is the responsibility of every employee, and all



ideas will be valued and considered on their merits without regard to the employee's position or formal qualifications.

We are all responsible to observe the Code. Take the time to read and understand the Code. Always remember that no sales or marketing target, no effort to outdo our competition, or desire to please the boss outweighs our commitment to our core values and the Code. Our commitment to our core values and the Code always comes first.

We are all accountable for taking the initiative to understand our responsibilities, ask questions, seek guidance and find solutions.

We have all the essential building blocks to continue to excel in achieving our goals. Let's do it together with an unwavering commitment to our core values and the Code.



George T. Baran
Executive Chair, Board of Directors
Trudell Medical Limited

Trudell Medical Limited – Code of Conduct

1. INTRODUCTION TO THE CODE

WHAT YOU NEED TO KNOW ABOUT THE CODE

The Code of Business Conduct and Ethics (the “*Code*”) reflects our commitment to high standards of business conduct and ethics and compliance with all applicable laws and regulations. The Code is a road map designed to help you to act and to do your job in a manner that is consistent with and adheres to our core values, policies, and applicable laws and regulations. You will be required to certify compliance with the Code annually.

Our Code provides a broad outline of our obligations for responsible business conduct. It supports our promise to manage for the long term and never compromise our integrity to deliver results. We are all accountable for taking the initiative to understand our responsibilities, ask questions, seek guidance and find solutions. This Code presents each of us with an ethical framework to help guide our response to the sometimes challenging and difficult choices we may encounter in a way that supports our values and purpose. The answers may not always be clear-cut or easy to see, but this Code can help. This Code contains several resources and contacts you can use to help make the best ethical choices, find answers to your questions and report concerns. Together, we can continue to strengthen

our commitment to compliance and accountability and to improving the safety and cost of healthcare for generations to come.

The Code provides an overview of the standards we are held accountable to and is supported and further explained by applicable policies and procedures or legal requirements that apply to your role.

The examples included in our Code materials of what is expected and what to avoid are drawn from these more detailed policies.

Copies of the Code are available on our intranet (Intranet Site) and internet (Website).

WHO DOES IT APPLY TO?

The Code applies to all board directors, officers and employees of Trudell Medical Limited and its affiliated companies. Employees who engage vendors, suppliers, consultants or other third parties on behalf of Trudell Medical Limited or any of its affiliated companies must ensure those third parties act in a manner that is consistent with and adheres to the Code and policies, as applicable.

Everyone is responsible for:

- setting an example and setting the tone;
- monitoring compliance with the Code;
- ensuring that those they supervise have adequate knowledge to adhere to the Code;
- supporting those who in good faith ask questions or raise concerns about compliance with the Code;
- reporting issues of noncompliance with the Code; and
- ensuring that there is no retaliation against anyone who in good faith asks questions or raises concerns about compliance with the Code.

We are all accountable for taking the initiative to understand our responsibilities, ask questions, seek guidance and find solutions.

If you do not comply with the Code, including, but not limited to, any applicable Company policies and laws and regulations, you will be subject to disciplinary action, up to and including immediate termination of your employment, appointment or contract with the Company. You may also be subject under applicable law to civil and/or criminal sanctions.

The Company is subject to numerous laws and regulations that change from time to time. You should refer to the Company's policies that apply to your job for additional detail. Where there is no policy or standard in the Code that addresses a particular situation, you are expected to apply common sense, the Company's core values, and to seek appropriate advice from the Compliance Office of the Legal department (the "**Compliance Office**"), or department head, the Legal department, or the Human Resources department prior to addressing the particular situation. If any conflict or inconsistency arises

between the provisions of the Code, Company policies, or applicable laws and regulations, deference will be given to the provisions establishing the highest standard of conduct.

By following applicable laws and regulations, our core values, our Code of Conduct, and our policies and procedures, we foster an environment that makes our Company a place where employees want to work, customers and suppliers want to do business, and patients and investors want to place their confidence and trust. Employees want a work environment where they can trust others to be honest and act with integrity.

Company policies applicable to your job or position in the Company can be found in your Employee Handbook, on the Company's intranet site, or at your Human Resources department.

WHERE CAN YOU FIND COMPANY POLICIES?

Company policies applicable to your job or position in the Company can be found in your Employee Handbook, on your Company's intranet site, or with your Human Resources department.

WHAT IF THE CODE, COMPANY POLICY, AND THE LAW CONFLICT?

If any conflict or inconsistency arises between the provisions of the Code, Company policies, or applicable laws and regulations, deference will be given to the provisions establishing the highest standard of conduct.

WHAT DO THE WORDS "COMPANY", "EMPLOYEES", "WE", "YOU", "OUR" AND "POLICIES" MEAN?

The words "employees" and "you" refer to employees, officers and board directors of the Company and third parties acting on the Company's behalf. The words "Company", "we" and "our" refer to Trudell Medical Limited and its operating company affiliates. The word "policies" refers to the Company's policies, rules, standards and guidelines in effect from time to time including, but not limited to, the policies referenced specifically in the Code.

2. SPEAKING UP

You must speak up if you need advice or guidance on the proper course of action to take, you believe an employee or third party acting on the Company's behalf is not complying with the Code, Company policy or applicable law or regulation, or you believe you have acted contrary to the Code.

One of the most important things you can do is to demonstrate personal accountability by asking questions, seeking guidance and raising concerns. Any employee, who in good faith asks questions, seeks guidance or raises a concern, is doing the right thing. Everyone makes honest mistakes, but there's no such thing as an honest cover-up.

If you are ever uncertain if something violates the Code, please speak up and report your concerns to the Compliance Office or Human Resources.

WHERE DO YOU GO IF YOU HAVE A QUESTION, CONCERN, OR WANT TO REPORT NONCOMPLIANCE?

You should ask your question, raise your concern, or report known or suspected noncompliance with

the Code with any of the following:

- your supervisor (this is usually a good place to start);
- the head of your department;
- the Human Resources department;
- the Compliance Office; or
- the Chair of the Company

If you feel uncomfortable asking questions, raising concerns, or reporting noncompliance directly with any of the above, or wish to raise an issue anonymously, you can call (via a toll-free number) or send an email to the *Compliance Hotline*. The *Compliance Hotline* is run by an independent company that is not staffed by Company employees. A summary of your call or the content of your email will be sent to the Compliance Office of the Legal department. The *Helpline* operates 365 days per year/24 hours a day/7 days a week.

You may choose to make your report anonymously. However, please include as much information and detail as possible in the report.

In addition to the Compliance Office and the Compliance Hotline, you may submit written concerns or reports of possible violations regarding accounting, auditing, internal controls or financial reporting, bribery, accounting fraud, insider trading, fraud or financial wrongdoings to the Executive Chair of the Company via letter at: 725 Baransway Drive, London, Ontario, Canada N5V 5G4, or by private and confidential email to gbaranprivate@tmlcorp.com. Submissions need not be in formal written form. A simple note outlining key details will suffice to open the conversation. "Private and Confidential" should be added to the address details for postal or interoffice mail code violation letters addressed to George Baran.

Please refer to the Reporting Compliance Concerns policy.

Compliance Office Contact Details:

Primary Contact: Compliance Manager (International) & Compliance Manager (USA)

Email: CODELCO@tmlcorp.com

Secondary Contact: EVP & General Counsel

Email: gc@tmlcorp.com

Compliance Hotline:

• **Toll-Free Telephone:**

- 844.280.0005 (English Speaking Canada and US)
- 855.725.0002 (French Speaking Canada)
- 800.216.1288 (Spanish Speaking US and Canada)
- 844-301-0005 (Language Other than English, Spanish or French US and Canada)

- **Website:** www.lighthouse-services.com/tmlcorp

- **E-mail:** reports@lighthouse-services.com (must include company name with report)
- **Fax:** (215) 689-3885 (must include company name with report)

WILL THE COMPANY INVESTIGATE?

We take all reports of noncompliance with the Code seriously. The report will be submitted to the Compliance Office. Either someone from the Compliance Office and/or, if appropriate, someone from the Human Resources department, will contact you directly to gather additional information if and as necessary to carry out and complete an investigation.

The investigation will be carried out confidentially to the extent possible, while having regard to the nature of the noncompliance and applicable law. If your report was submitted anonymously through the *Compliance Hotline* or otherwise, our ability to investigate may be limited unless we are able to obtain additional information from you. You should use the Company's form of report for non-compliance with the Code as posted on the Company's intranet site. The form is also available from your Human Resources department.

You do not have to be certain that an action or inaction does not comply with the Code before submitting your report, so long as you have genuine concerns and are raising those in good faith.

It is a breach of this Code to make a report in bad faith. Depending on the nature of the non-compliance with the Code, specific procedures as set out in the applicable Company policies may apply. All employees must assist and cooperate in an investigation initiated by the Company.

If you have made a report or been identified through the Compliance Hotline or if you have otherwise been incriminated in connection with a Compliance matter, you may have a right of access to the personal data relating to you. This right of access may allow you to request that this personal data be rectified or deleted if the data is inaccurate or incomplete. If raised in good faith, this may allow you to object to the processing of the data. All actions must be in accordance with the law applicable in the country of your employment with the Company. If you wish to exercise any of these rights and obtain information that relates to you, you may contact the Human Resources department. You will be informed if you have been the subject of a report as soon as the report is made, unless local law prevents TML from providing such information. However, such information can be delayed if this is necessary for the preservation of evidence.

Please refer to the Reporting Compliance Concerns policy.

RETALIATION

We do not tolerate retaliatory conduct of any kind. Any employee that retaliates against an individual because he or she in good faith asked questions, raised concerns, or reported noncompliance with the Code, or assisted or cooperated in an investigation arising from a concern or report of noncompliance with the Code, will be subject to disciplinary action up to and including immediate termination of employment, appointment or contract. The Company will not discharge, demote, suspend, threaten, harass or, in any manner, retaliate against an employee who in good faith raises a concern about any actual or suspected misconduct or other risks to the business. If you believe you have been retaliated

against for providing such information, you should immediately contact the Compliance Office, Human

Resources or the Compliance Hotline.

Reports of retaliation should be reported immediately to the Compliance Office or Human Resources department.

3. THE WORKPLACE

We expect and are committed to a positive work environment that is safe and professional and that values teamwork, respect, diversity, integrity and trust. Our employees are our greatest strength and form the foundation upon which our success and reputation rests. All employees play an important role in fostering a work environment that is inspiring and welcoming. By adhering to our workplace policies, employees play an important part in supporting and maintaining a positive work environment.

Treating each other with dignity and respect is the foundation of good business conduct and helps maintain a safe and productive workplace. We care about people as individuals and acting with integrity means valuing and respecting the unique character of each employee and the contribution each makes to create value and contribute to the success of the Company. Providing people with equal opportunities to develop their full potential encourages higher quality and more productive work, reduces employee turnover and increases employee morale and engagement. Employees will be more satisfied with their jobs and their work environment in a workplace that is safe and where people treat each other fairly.

DISCRIMINATION AND HARASSMENT

We are committed to providing equal opportunities in employment, appointment and advancement based on appropriate qualifications, requirements and performance, and do not tolerate unlawful workplace discrimination. We do not tolerate discrimination based on sex, disability, race, national origin, sexual orientation, age, religion, or other protected characteristics prohibited under applicable law.

We are committed to fostering a workplace that is free of any sexual harassment and any other form of harassment, whether physical or psychological. Harassment can include, for example, repeated words or actions against an employee that are known or should be known to be unwelcome. Upon hire and annually thereafter, all employees are educated on the signs of harassment and how to report any concerns.

SAFE AND SECURE WORKPLACE (VIOLENCE-FREE WORKPLACE)

We are committed to providing our employees with a safe and secure workplace. Safety is especially important in manufacturing locations, which are subject to significant workplace safety regulations. Each workplace has safety rules that must be followed. You are responsible for knowing the health and safety requirements associated with your job or position.

A safe and secure workplace also means a workplace that is free of violence. Any exercise or attempted exercise of physical force by a person against an employee that causes or could cause physical injury to the employee is considered workplace violence. A statement or behaviour that it is reasonable for an

employee to interpret as a threat to exercise physical force against him or her that could cause physical injury to the employee is also considered workplace violence.

Upon hire and annually thereafter, all employees are educated on the signs of workplace violence and how to report any concerns.

DRUG AND ALCOHOL IMPAIRMENT

The use of alcohol and drugs may have a negative impact on your performance and on the Company's reputation. Drug and alcohol impairment on the job is treated as a serious matter. The use, possession or sale of illegal drugs is prohibited at all times.

Employees must comply with the Company's **Drug and Alcohol Policy**.

4. CONDUCTING BUSINESS

We expect and are committed to high quality standards and safety for our products and services and meeting government regulatory requirements and international standards applicable to our business. We have built a reputation for developing and manufacturing quality products and for delivering quality service. By focusing on quality manufacturing processes and service delivery, and on continuous improvement, we continue to earn the trust of patients, customers, and healthcare providers.

The quality and integrity of our products and services are critical to our success and essential in helping our customers deliver safe, effective patient care. Through superior execution, we demonstrate a high level of business ethics and integrity to our customers and their patients by delivering product reliability and customer satisfaction. Every employee is responsible for quality and must be committed to providing products that are safe and effective for their intended uses.

We work in a highly regulated industry and must follow the requirements set by various regulatory agencies around the world, including, but not limited to, the Food and Drug Administration (FDA), Health Canada, German Commission E, as well as the International Organization for Standardization (ISO).

You all share a responsibility to maintain our high-quality standards and commitment to safety by:

- making patient safety a paramount focus of our manufacturing and service delivery efforts;
- engaging only suppliers and other third parties who share the same commitment to quality and safety;
- never sacrificing quality to meet a deadline or target; and
- adhering to our policies and all applicable laws, regulations, and standards.

Delivering high quality products and services is vital to our business success. Hospitals, doctors and patients rely on us to provide quality healthcare products and services around the world. Products and services that do not meet quality standards jeopardize the safety and security of our employees, customers and their patients. With strict regulatory requirements governing our business, we cannot

afford to violate or fall short of meeting our quality commitments.

Please report any quality concerns to your department leadership.

CUSTOMER FOCUSED

We are committed to fostering a customer focused culture. It is vital that we earn and maintain our customers' trust. This is achieved through fair, honest and lawful dealings and by delivering great value and service.

Every employee represents us to our customers and the public. The way you do your job presents an image of our Company. Customers judge us by how they are treated with each employee contact. You should always be courteous, friendly, helpful, honest, and prompt in the attention you give customers.

Employees who interact with customers at their facilities must familiarize themselves and comply with the customers' policies that apply to such interactions.

MARKETING OUR PRODUCTS AND SERVICES

We expect and are committed to our products and services being advertised and promoted honestly, and accurately. Our promotional material and activities not only represent our products and services, but also our Company. You must ensure that they contribute to our reputation as a trusted provider of quality products and services.

Employees involved in the creation, presentation, or coordination of promotional material or activities for our products or services must:

- make patient safety a top priority of the promotional effort;
- present all information honestly and accurately;
- ensure the materials or activities promote the use of our products for their intended and approved or cleared use;
- ensure that product claims are supported by appropriate clinical and test data; and
- adhering to our policies and all applicable laws and regulations.

ANTI-BRIBERY AND ANTI-CORRUPTION

We expect and are committed to compliance with laws that prohibit bribery and corruption. These laws include *The Corruption of Foreign Public Officials Act* (Canada), *Foreign Corrupt Practices Act* (United States), and *Bribery Act* (United Kingdom). These laws prohibit the giving or offering of anything of value, directly or indirectly, to a government official to obtain or retain business or favorable treatment.

Healthcare providers working for government institutions, like public hospitals or universities, are considered government officials.

We foster global relationships with our customers to better understand their businesses and help solve healthcare's most difficult challenges. Our product development process is rooted in this approach.

The term "customer" includes any person in a position to purchase or to influence a decision to purchase our products or services. We must interact appropriately with customers and pay particular attention to the special rules that apply when dealing with governmental officials and entities (e.g., government-owned or operated hospitals, etc.)

We may not provide or offer any donations, grants, scholarships, subsidies, support, consulting contracts or gifts to a customer in exchange for purchasing, recommending or arranging for the purchase of products or for a commitment to continue to purchase products. Nothing may be offered or provided irrespective of its value, in a manner that would serve as an improper inducement to purchase products or services.

Wherever we do business, employees and third parties acting on our behalf must comply with all anti-bribery laws that make it a crime to bribe "foreign governmental officials" including, among others, those employees who work for public or quasi-government hospitals, clinics and pharmacies in other countries, as well as their management teams.

Interactions with healthcare professionals are governed by our policies and numerous laws and regulations around the globe. Offering or accepting meals, gifts or entertainment in violation of applicable laws and regulations, the Code or our policies can lead to severe reputational damage and potential liability to you and the Company. If you have a question as to whether an activity is restricted or prohibited, seek assistance from your supervisor or the Compliance Office before taking any action. You must comply with the Company's policy relating to anti-corruption/anti-bribery.

COMPETITION AND ANTITRUST

Competing fairly and honestly in the marketplace will build our long-term relationships with suppliers and customers and help grow our business by enhancing our reputation. Fair competition is an issue of increasing importance to lawmakers and regulators in the countries in which we operate. Keep in mind that how we do business impacts our personal reputations as well. We expect and are committed to selling our products and services based on their quality and efficacy, not based on unfair competitive activity. This commitment extends to our interactions with competitors, customers and other third parties.

Competition laws serve to maintain fair market competition and impose severe penalties for violations. These laws generally prohibit agreements, formal or informal, with competitors that harm competition or customers, including, but not limited to, price fixing and allocations of customers, territories or contracts; agreements, formal or informal, that establish or fix the price at which a customer may resell a product; the acquisition or maintenance of a monopoly or attempted monopoly through anti-competitive conduct; and deceptive or unfair claims and statements.

Certain kinds of information, such as pricing, development plans and strategy, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social. You must comply with our policies that apply to Competition Laws.

TRADE COMPLIANCE AND FAIR DEALING

We are committed to complying with trade laws that apply to the export or re-export of products and technology. Some trade laws prohibit the export and re-export of products and/or technology to certain countries.

Employees involved in the exporting or re-exporting of products and/or technology are responsible for ensuring that the transaction is permitted by applicable law, that the required documentation is complete and accurate, and that any mandatory export licenses are obtained prior to the export or re-export of products or technology.

We expect and are committed to outperform our competition fairly and honestly. Advantages over our competitors are to be obtained through superior performance of our technology, products, and service, not through unethical or illegal business practices.

Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance the Company's interests. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if employees have any questions about the legality of proposed information gathering, employees must consult with their supervisor or the Compliance Office, as appropriate.

Employees are expected to deal fairly with customers, suppliers, employees and anyone else with whom employees have contact in the course of performing their job.

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favours.

INSIDER TRADING

Employees may not use or share for stock trading purposes any material, non-public information they receive or have access to from other companies when carrying on their jobs. Material, non-public information includes any information that has not been disclosed to the public and that would be regarded as important in making an investment decision.

While in possession of such material, non-public information you must not buy or sell publicly traded securities of the company involved or sharing this information with those that are not authorized to know the information. This prohibited sharing of information is known as "tipping" and is illegal. You must exercise the utmost care when handling such material, non-public information.

LIMITS ON AUTHORITY AND AGREEMENT REVIEW

Employees should be aware of the limitations on their authority to act on behalf of the Company and should not take any action that exceeds those limits. You must not sign any agreement on behalf of the Company, or in any other way represent or exercise authority on behalf of the Company or bind the Company, unless specifically authorized to do so by a Company policy, the Board of Directors, or an

authorized Executive Officer.

If you are authorized to sign any agreement on behalf of the Company, you must comply with the Company's policy relating to contract review, approval and signature and any other Company policy which sets out limits of authority and the internal review, due diligence, and approval process to be followed having regard to the type of agreement to be signed and the business or other partner with whom we intend to contract with.

HUMAN RIGHTS AND MODERN SLAVERY

We are committed to upholding human and workplace rights and we are committed to ensuring ethical conduct and collaborating with ethical business partners who do not utilize forced labour or child labour.

We are committed to:

- treating all individuals with dignity, fairness, and respect;
- providing safe and inclusive workplaces free from discrimination, harassment, and abuse;
- upholding fair labour practices, including the right to freely choose employment and the prohibition of child and forced labour;
- supporting the health, safety, and well-being of our employees, customers, and communities;
- using effective systems and controls to prevent forced and child labour from taking place within our business or supply chains; and
- adhering to forced and child labour reporting and disclosure obligations in all countries where this is required.

5. CONFLICTS

We expect our employees to make decisions and take actions that reflect the best interests of the Company. In support of our core beliefs, employees must avoid any activity or personal interest that creates or appears to create a conflict of interest with respect to your responsibilities. A conflict of interest arises when your personal, social, financial or political activities have the potential of making it difficult for you to perform your work in the best interest of the Company.

By avoiding actual conflicts of interest as well as the appearance of a conflict of interest, you will be able to act based on sound business judgment, not personal interest, relationship pressure or gain. Managing conflicts of interest means that we always act in the best interest of the Company and avoid legal and regulatory risk and reputational harm.

Employees must avoid conflicts of interest and the appearance of conflicts of interest. A conflict of interest will occur when an employee's personal interests may interfere with the performance of his or her duties or the best interests of the Company.

Employees must be free from influences that conflict with the best interests of the Company or might deprive the Company of their undivided loyalty in business dealings. Conflicts of interest are prohibited unless specifically authorized in writing by an employee's supervisor and the Human Resources

department or, if you are an officer or director, by the Board of the Directors.

Employees are required to disclose in writing to their supervisor and the Human Resources department or, if you are an officer or director, to the Board of Directors, all business, commercial or financial interests or activities that might create a conflict of interest. Conflicts of interest can typically be addressed so long as employees disclose them early on. Failure to disclose a conflict of interest is a breach of this Code.

FAMILY MEMBERS AND CLOSE PERSONAL RELATIONSHIPS

We expect employees to recognize that relationships with family members and close personal friends can influence their decisions. Employees must be careful about Company business decisions that involve close personal relationships. Please review our anti-nepotism policy regarding close relationships and family members.

To prevent conflicts of interests, you must avoid supervising or taking part in the hiring or promoting of a family member and avoid holding a position with access to or influence over performance appraisals, salary information or other confidential information related to a family member. These situations must also be avoided in connection with another employee or prospective employee with whom one has a close personal relationship, whether romantic or not.

If any of these situations might occur or are occurring, you must immediately inform your supervisor and the Human Resources department of the relationship to seek approval or to address the conflict. Failure to inform your supervisor and the Human Resources department is a breach of this Code. Employees must comply with the Company's policy relating to conflict of interest.

CORPORATE OPPORTUNITIES

We expect that no employee will take personal advantage of opportunities for the Company that are presented to him or her or discovered by him or her as a result of his or her position with the Company or through his or her use of corporate property or information, unless expressly authorized by the Board of Directors. An employee must not use his or her position with the Company or corporate property or information for improper personal gain or for the gain of a third party to the detriment of the Company.

Even opportunities that are acquired privately by employees may be questionable if they are related to the Company's existing or proposed lines of business. Significant participation in an investment or outside business opportunity that is directly related to the Company's line of business must be pre-approved by your Human Resources department or, if you are an officer or director, by the Board of Directors.

GIVING BUSINESS COURTESIES

Bribery and corruption damage our business and conflict with our core values. Employees who engage in bribery or corrupt activities are acting outside of their scope of employment and will, within the limits of applicable law, be subject to discipline up to and including dismissal as well as civil fines and criminal penalties. Furthermore, TML may be held liable for the bribery and corrupt activities of third parties that are acting on our behalf. Business courtesies should never be used to bribe an entity to partner with TML.

We expect that a business courtesy, such as a gift, meal or other entertainment, given by an employee complies with our policies and applicable law. Under no circumstances should a business courtesy be given to gain improper advantage with a customer or facilitate approval from a government official. A gift of cash or cash equivalent is never permissible regardless of the purpose of the gift.

Our business consists of medical device products and healthcare services. As such, interactions with physicians, respiratory therapists, nurses, and other healthcare providers may be required as part of your job or position. You must ensure that any interaction with a healthcare provider serves an appropriate and ethical business purpose, does not interfere with the healthcare provider's professional independent judgment, and complies with applicable law and policies, including, but not limited to, our policies relating to interactions with healthcare providers and anti-corruption/bribery.

You must always be mindful and respectful of intended recipient's employer's or organization's policy on business courtesies. Even if a business courtesy to, for example, a customer may be permissible under our policies and applicable law, but is not permissible under the customer's policy, you must not offer or give the business courtesy.

Special consideration must be given to situations that require as part of your job or position interaction with a government employee or public official. You must comply with our policy relating to anti-corruption/anti-bribery when interacting with a government employee or public official.

Employees should also refer to our policy relating to gifts and to our business courtesy guidelines and rules.

RECEIVING BUSINESS COURTESIES

Employees must never solicit business courtesies. Unsolicited business courtesies should be appropriate for the position the employee occupies within the Company and clearly intended to facilitate business objectives. When tickets to a sporting or cultural event are offered, the person offering the tickets must be attending the event as well.

Employees must not accept business courtesies that may reasonably be considered to affect their judgment or actions in the performance of their duties. Employees must never accept gifts of cash or cash equivalent regardless of the purpose of such gift.

Employees should refer to our policy relating to gifts and our business courtesy guidelines and rules. We expect that information supporting the entries to our business records is valid, accurate and complete. Business records include, among other things, accounting and financial data, payroll records, expense reports, budgets, customer and vendor records, invoices, quality control and regulatory records, and manufacturing records. Employees must complete business records accurately and honestly. The making of false or misleading entries, whether they relate to financial results or otherwise, is strictly prohibited.

Our business records serve as a basis for managing our business and are important in meeting our obligations to customers, patients, government agencies, suppliers, creditors, employees and other

stakeholders. Our books, records and accounts must accurately and fairly reflect, in reasonable detail, its assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities. Financial record and financial statements must conform to the applicable accounting principles.

MANAGING AND CREATING RECORDS

We expect that our employees comply with record creation and retention requirements under applicable law. Records are not limited to physical paper documents, but also include electronic data and files, including, but not limited to, emails and texts. An employee's department will typically have a record creation and retention policy.

You must be mindful of situations when you will be required by law to maintain records for periods longer than those specified in a record retention policy or pursuant to the applicable retention requirements. Document holds due to litigation, audits or investigations typically require the preservation of relevant records. Employees must ensure that records subject to such holds are preserved for as long as the hold remains in effect, notwithstanding that the employee's department's record retention policy may provide that the record can be destroyed.

Employees make decisions every day based on the information that is recorded by other employees at all levels of the Company. It is critical that employees who create or maintain reports, records or any other information review the integrity and accuracy of that information and never create a false or misleading document. This includes but is not limited to: financial statements and related accounting entries and adjustments; expense reporting; time reporting; production and quality records; and documents filed with or submitted to governments or regulatory agencies.

The Company is required to file various documents with regulatory agencies that must be based on accurate books and records. In addition, business documents and communication may become public through litigation, government investigations and the media. You need to be mindful that records may be viewed by those you did not intend, such as a court of law, a government agency, or the media. For example, during litigation we must produce to the court all documents that are relevant to the litigation. The only exception applies to records that are subject to the solicitor/attorney-client privilege.

Employees must use sound judgment when creating records and refer to Company guidelines and rules regarding safe communications.

PROTECTION AND PROPER USE OF COMPANY ASSETS

All employees are expected to protect our assets and ensure their efficient use. These assets, which include both physical items, such as office supplies, computer equipment, furniture, buildings and products, and informational assets such as intellectual capital including, but not limited to, work documents and electronic information, play a vital role in bringing innovative new products and services to market and in our ability to obtain intellectual property rights to such innovations, such as patent rights.

Theft, carelessness and waste of our assets have a direct impact on our profitability. Our assets are expected to be used only for legitimate business purposes, although incidental personal use may be

permitted in limited circumstances if and when authorized by a Company policy. Under no circumstances may employees use the Company's name, any brand name or trademark owned or associated with the Company or any letterhead stationery for any personal purpose.

Use of our assets must at all times be appropriate and responsible. You must handle our assets with care. Every employee is responsible for using the Company's information systems and computer systems, including, but not limited to, the internet, email, and chats via Microsoft Teams or other workplace communication platforms, properly and in accordance with our policies, such as the Company's policies relating to digital resources, generative artificial intelligence use in the workplace, social media, and anti-spam.

6. INTELLECTUAL CAPITAL OF THE COMPANY AND THIRD PARTIES

The Company's intellectual property (IP), including, but not limited to, trade secrets and other confidential information, copyrights, patents, trademarks, designs, logos, slogans, marketing materials, databases, software, ideas, business methods and processes, research and development, and inventions, are critical to the Company's success and are irreplaceable assets. All employees are responsible for securing and protecting the use of the Company's IP.

You must use IP only as required and authorized in your job or position and only for the benefit of the Company. Certain Company policies apply to certain types of IP, such confidential information, trademarks and patents. If you become aware of or suspect any inappropriate use or infringement of any of the Company's IP, you must immediately notify the Legal department.

Employees who have received or have access to confidential information (including, but not limited to, trade secrets) should take care to keep this information confidential and only use it for the benefit of the Company and in accordance with the Company's IP policies. You should refer to the Company's confidential information policy and guidelines for examples of confidential information.

Since the Company interacts with other companies and organizations, there may be times when employees may learn confidential information about other companies before that information has been made available to the public. Employees must treat this information in the same manner as employees are required to treat the Company's confidential information. There may even be times when employees must treat as confidential the fact that the Company has an interest in, or is involved with, another company. Employees who have access to third party company information should make sure to familiarize themselves with any applicable confidentiality obligations as set out in any agreement between the Company and the third party.

As we expect our competitors, suppliers and our customers to respect our valid intellectual property rights, we also are committed to respecting our competitors', suppliers' and our customers' valid intellectual property rights. Employees must follow the Company's Intellectual Property (IP) clearance policy and procedure. Employees must not use the IP that belongs to others unless permitted by the terms of an applicable license agreement or otherwise permitted by applicable law.

You must maintain the Company's confidential information in strict confidence, unless and until that

information is released to the public through approved channels or if you are authorized to disclose it pursuant to the Company's confidential information policy. The policy requires that a Company approved non-disclosure agreement or confidentiality agreement be put in place with an intended recipient prior to any disclosure. You must consult with the Legal department before entering any such agreement.

Employees should refrain from discussing confidential information with outsiders and even with other Company employees, unless those fellow employees have a legitimate need to know the information and the disclosure is authorized by the Company's confidential information policy. Unauthorized use or distribution of this information could also be illegal and result in civil liability and/or criminal penalties. Employees are expected to take care not to inadvertently disclose confidential information. Materials that contain confidential information, such as memos, notebooks, computer disks, mobile devices, memory sticks, computers, tablets, and laptop computers, should be stored securely, require the use of a password to access, and be marked confidential, as applicable.

PRIVACY

In the course of business, you may have access to and/or collect and store, as part of your job, personal data about employees, customers, patients, healthcare providers, and others, such as birth dates, home addresses, and financial, medical and other information. When you collect and process personal data you must comply with all applicable laws and our privacy policies and any contractual obligations that may apply to the personal data.

Personal data must only be collected for legitimate business purposes, shared only with those who have a need to know the information and are allowed access to it, protected in accordance with security and confidentiality policies and retained only for as long as necessary (e.g., HIPAA, GDPR). You also must ensure that third parties who have access to personal data are contractually obligated to protect it. Policies related to storage and dissemination of personal data can be found on the Company intranet site.

7. OUR COMMUNITY

COMMUNICATING ON BEHALF OF THE COMPANY

The information we publicly communicate has a direct bearing on our reputation in our industry and the communities in which we operate. Our reputation is the key to our success.

All communications made on behalf of the Company to the public must be passed by and approved by the Executive Chair of the Board of Directors prior to dissemination. If you are approached with an inquiry about the Company or a request for a company statement, you should refer the requesting party to the Executive Chair of the Board of Directors.

In cases where a government or regulatory agency requests company information, the Finance, Legal or Regulatory Affairs department must be consulted and approve the release, prior to the communication or transfer of information. In cases where you are contacted by an outside lawyer representing another company or person you should refer the lawyer to the Legal department. In cases

where you receive a statement of claim, a legal complaint, a summons, subpoena or other similar legal document, you should immediately notify and consult with the Legal department. If communications to the public arise from an incident giving rise to a crisis, you must comply with the Company's crisis management plan.

PUBLIC POLICY AND THE POLITICAL PROCESS

We are committed to championing the development of legislation and regulations that ensure patients have access to innovative products that will enable them to live a better life. Any employee involved in our public policy efforts must follow applicable laws and regulations and applicable policies, including, but not limited to, internal review and approval requirements.

Employees are free to participate in local government and the political process, but this participation must be on an individual basis and not on Company time. You must not use Company assets to support your personal political activities. You must ensure that your participation in political activities is clearly your own and not seen as a statement or action by the Company. You should not wear Company branded items during your personal participation in the political process.

You must not make any contribution to a political party or candidate on behalf of the Company unless approved by the Compliance Office of the Legal Department in consultation with the Executive Chair of the Board of Directors.

REQUESTS FOR CHARITABLE CONTRIBUTIONS AND SPONSORSHIPS

We are committed to creating a positive impact in the communities in which we operate.

All requests for charitable contributions must be referred to The Mitchell and Kathryn Baran Family Foundation. The Foundation works to better our communities by providing charitable contributions to non-profit organizations focused on health services, education, civic programs and other philanthropic areas.

We will at times support charitable and not-for-profit organizations by making corporate donations, attending dinners and other events. Decisions as to which charitable or non-profit entities and events may be supported are made by the Executive Chair of the Board of Directors.

THE ENVIRONMENT

We are committed to conducting our business in an environmentally responsible way that minimizes environmental impacts. We aim to minimize and, if practicable, eliminate the use of any substance or material that may cause environmental damage, reducing waste generation and disposing of all waste through safe and responsible methods, minimizing environmental risks by employing safe operating procedures, and being prepared to respond appropriately to accidents and emergencies.

8. ADMINISTRATION

WHO IS RESPONSIBLE FOR ADMINISTERING THE CODE?

The Code is monitored by the Compliance Office. The Compliance Office partners with our business to understand their needs and create a compliant approach to our operations. The Compliance Office is

responsible for standardizing all training and for ensuring that appropriate training on the Code is provided to employees.

Although the Compliance Office is tasked with driving the Company’s compliance efforts, all employees ultimately share this responsibility. Employees are expected to adhere to the Code at all times.

MODIFICATIONS TO THE CODE

The Company may modify the Code from time to time. The modified Code will come into effect once posted on the Company’s intranet site and distributed to employees.

NO RIGHTS CREATED

The Code is not intended to and does not, in any way, constitute an employment agreement or an assurance of continued employment or create any rights in any director, officer, employee or any third party required to comply with the Code.

CONTACTS

Topic	Department	Email
Discrimination, Harassment, Retaliation	Human Resources	hr@tmlcorp.com
Fraud, Anti-Bribery, Contracts, Intellectual Property	Legal	counsel@tmlcorp.com
Due Diligence, KOLs, HCPs, Concerns	Compliance	codeco@tmlcorp.com
Data Privacy	Privacy	globalprivacy@tmlcorp.com
Human Rights and Modern Slavery	Compliance	codeco@tmlcorp.com

Frequently Asked Questions (FAQs) related to the Code of Conduct can be found here.

Examples of Expected Actions and Avoidable Actions by Employees can be found here.

Version	Date Reviewed/Revised	Reviewed/Revised by	Revision Remarks
1.0	March 8, 2016	Legal/SLT/Board	Updated Code
2.0	May 23, 2019	Legal/SLT/Board	Updated Code
3.0	August 2, 2019	Legal/SLT/Board	Updated Code
4.0	June 4, 2020	Legal/SLT/Board	Updated Code
5.0	June 24, 2025	Compliance/SLT/Board	Updated Code to reflect Opcos