



Code of Conduct

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Etigam bv
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The Netherlands



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Letter from the CEO

Since 1980, Etigam B.V, a family business has enjoyed a reputation of ethical excellence. Our values are the foundation of our success, and they demonstrate an enduring commitment to the well-being of our employees, ethical business practices, high standard products and honesty and integrity in dealing with our business partners.

We can proudly declare that Etigam B.V. is recognized as a trusted partner to our relations around the world. Exporting to over 75 countries, partnering with some of our global distributors for decades and in some cases carrying on doing business through generations.

A large percentage of our employees work for Etigam B.V for over decades. We cherish and celebrate every unique quality of each one of our employees, both the long term employees and also the freshness of the newcomers.

To enhance and maintain our success, we take an active role in ensuring that every employee, supplier and business partner will follow the guiding principles of Etigam B.V Code of Conduct. To ensure a fruitful and enduring relationship with our customers, distributors and business partners, we expect a mutual acknowledgement and agreement on the principles of this Code of Conduct.

This document is not all-encompassing and provides a set of guiding principles to incorporate with additional applicable policies. Our Code of Conduct aligns with standards and conventions developed by accredited agencies and global conduct policies. Our aim is to our employees, environment, community and business partners through responsible environmental, social and governance practices.

For Etigam,
Sincerely,

Erik Wolf

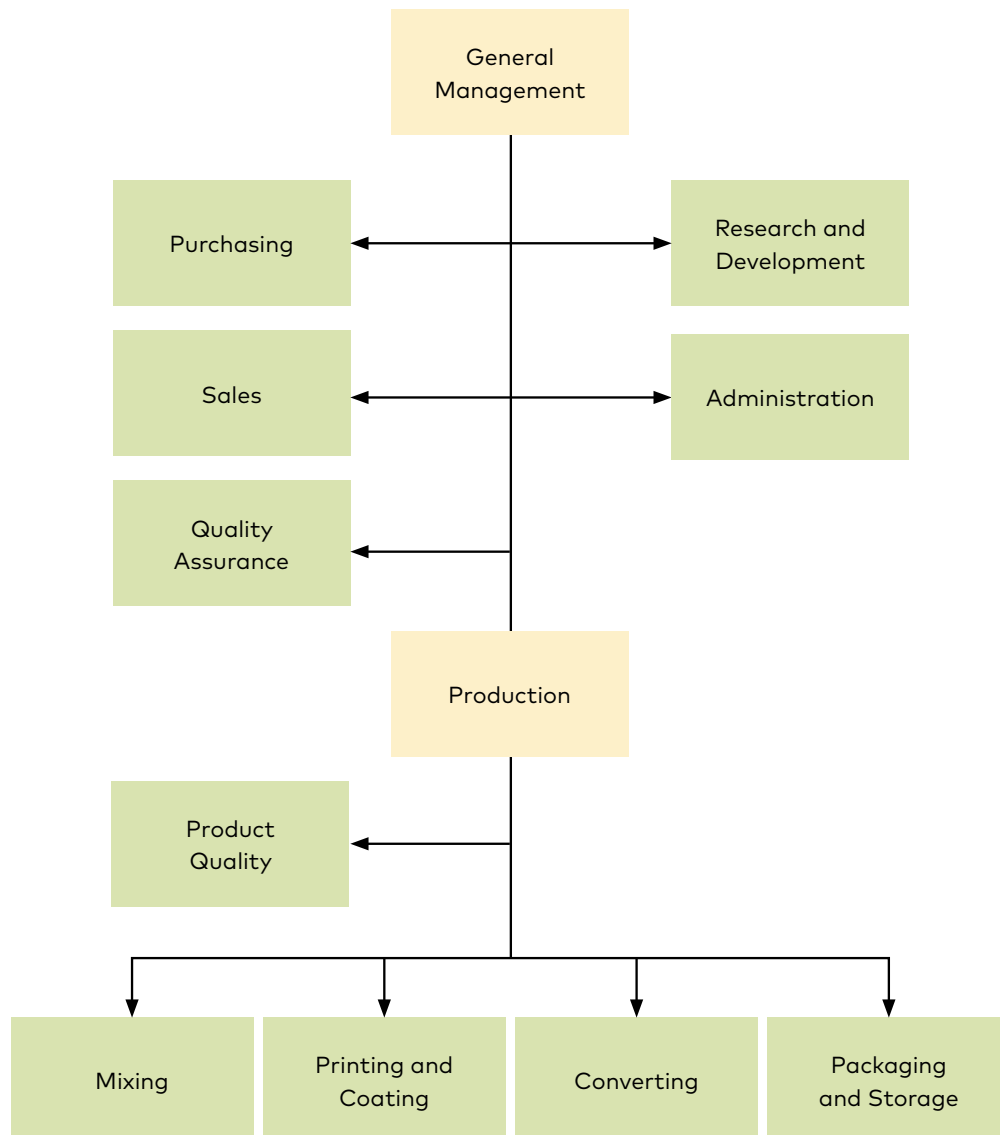


Introduction

The Code of Conduct is a guide to all employees and suppliers about ethical decision making – ‘doing the right thing’. It does not cover every individual ethical issue, but it provides general guidance and additional resources to promote, encourage and help employees to make ethical decisions with integrity, fairness and honesty. The goal is to ensure employees of making consistent choices and to maintain the company’s reputation for high ethical standards.

As a manufacturer, supplier and business partner we also expect that our business relations are aware of and in agreement with this Code of Conduct.

Organogram





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Human Rights and Labour

Etigam B.V. does not engage in any form of discrimination and treats their employees with respect, dignity and common courtesy. Etigam strives to create a culture that embraces diversity and to provide equal opportunities for all its employees.

- Employees are encouraged to give their best and to realize their full potential through learning and development opportunities.
- We support the principles of the general declaration of human rights.
- We comply with all national laws applicable to our business relating to labour standards.
- We do not use forced, bonded or involuntary prison labour.
- All of our employees have the right to join or form trade unions of their own choosing.
- Where a substantial proportion of the workforce is in agreement, they have the right to bargain collectively.
- Employee representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- We do not employ children unless it is for the purpose of academic or training development.
- We do not allow children under the age of 18 to work at night or in hazardous conditions.
- We comply with national laws and regulations regarding working hours, wages and benefits.
- Wages are never paid in kind.
- Wages are sufficient to meet basic needs.
- All employees are provided with written information about their employment conditions in respect to wages before they enter our employment.
- All employees are provided with written information about their wages for the pay period each time that they are paid.
- Deductions from wages as a disciplinary measure are not permitted.
- Deductions from wages not provided for by national law are not permitted without the written permission of the employee.
- All disciplinary measures are recorded.
- Not working alone in the premises.
- Standard working hours comply with national laws and national industry bench-mark standards.
- Employees do not work in excess of 48 hours per week. The standard working week hours comprises 35,5 hours per week.
- All overtime is voluntary and is not requested on a regular basis.
- We do not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, religious beliefs, union membership or political affiliation.
- We do not permit use of physical abuse or discipline, threats of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation.
- We provide regular employment to our employees wherever possible, rather than contracting, sub-contracting.
- We provide a safe and healthy working environment for our employees.
- We take all possible steps to prevent accidents and injuries to the health of our employees.
- We provide all of our employees with suitable and sufficient health and safety training.
- We provide suitable and adequate welfare facilities for all employees. This includes toilet facilities, drinking water and food storage.
- We operate a sickness / return to work process for all employees.
- We treat everyone with respect and offer equal opportunities regardless of gender, religion, age, disability, sexual orientation, nationality, political views, social background, or ethnic origin.
- Only minerals and metals are used that have been extracted and traded without contributing to abuse of human rights, unethical business conduct, e.g., corruption, environmental damage or funding for conflict.



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Business Partners

Etigam B.V. exports to over 75 countries worldwide through direct sales and local distributors. The headquarters is situated in The Netherlands and a second office in Toledo, USA, to cater to the USA market. Etigam BV also serves as a distributor of biological indicators.

We hold our business partners to strict requirements, which include:

- Business integrity.
- Prevention of corruption and bribery.
- Compliance with data protection regulations.
- Respect for intellectual property rights and adherence to non-disclosure agreements.
- Adherence to export control and customs regulations.
- Prevention of money laundering and financing of terrorism.
- Follow international geopolitical restrictions.

We expect our business partners to comply with the minimum standards stipulated in this Code of Conduct when carrying out their business activities. However, this does not release the business partner from complying with further individual laws and any other regulations of the country in which they operate.

Environment

Etigam B.V. has implemented actions and controls to reduce our use of energy, water, materials and substances in our products and services. Emissions to air, water and soil are identified and reduced to a minimum. Systematic waste handling procedures are implemented. Methods, procedures and equipment are implemented to handle, label, store and dispose chemicals in a safe way. Material Safety Data Sheets are available upon request.

The chemicals we use comply with the current Reach candidate list (SVHC) [and its annexes XIV, XVII, XIII, XV], European Rohs 3, Californian proposition 65 and TSCA regulations. New added substances on the several listings are assessed on regular basis and it is our duty to inform customers and third parties if our components are added to one of the lists.

Our products are PFA's (per- and polyfluoroalkyl substances) free, POP's (persistent organic pollutant) free, CMR's (cancerogenic, mutagenic, reproductive toxic substances) free, phthalates free, latex free, nano sized material free, nitrosamines free, and we do not use materials from vegetal origin or any mineral oils (MOAH: mineral oil aromatic hydrocarbons and MO and MOSH: mineral oil saturated hydrocarbons).

With an ethical concern, we do not use tissues or derivatives from human or animal origin. Our product don't contain any conflict minerals from conflict regions according to Regulation (EU) 2017/821.

Anti-Bribery & Corruption

Etigam B.V. conducts business with honesty, fairness and integrity and does not engage in, or tolerate, any form of bribery or corruption. Improper payments are not offered, provided or accepted and all payments are recorded accurate. All Etigam B.V. employees are obliged to strictly separate the interests of the company and private interests from each other. This is valid for the handling of customers, suppliers and all other institutions. All actions and purchasing decisions are carried out independent of considerations not concerning business or involving personal interests. The granting of personal benefits by Etigam B.V. and its employees with the objective of achieving advantages for the company, oneself or third parties is not allowed. Etigam employees are not permitted to demand or accept personal benefits or favours of value, monetary or other, when dealing with customers, suppliers and



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all other institutions. This generally does not apply to presents and invitations that fall within the scope of customary business hospitality, convention and courtesy.

Privacy and Trade Secrets

Etigam B.V. is committed to maintaining the privacy of information relating to its employees and customers. Personal data gathered by Etigam B.V. will be kept for as long as reasonably necessary for the purposes for which it was collected. Personal data that is no longer required to fulfil these purposes will be destroyed.

Etigam B.V. employees must keep trade secrets. Confidential business and personal information as well as confidential documents may not be disclosed to third parties, nor may third parties be allowed to gain knowledge thereof in any other manner, unless proper authorization has been granted or it concerns publicly available information.

Diligence and Good Faith

All employees must operate with loyalty in good faith, integrity and observing contractual obligations to which they have signed up. They must also be familiar with the contents of this Code of Conduct, modeling their conduct on respect, cooperation and mutual collaboration with all partners in dialogue.

Health and Safety

Etigam B.V. provides and maintains a safe working environment that meets national legislation. Appropriate actions are taken to monitor, report and prevent potential workplace accidents, incidents and illness. Precautionary measures are taken whenever there is reason to believe that a potential action may impact the

health or safety of a person in a negative way. Personal, protective equipment is provided. Emergency plans and response procedures are in place. The site is maintained clean and safe.

Customer Responsibility

Etigam B.V. is committed to being a responsible and valuable partner in the supply chain. Maintaining a sustainable business that serves its customers is very important to Etigam B.V. And we also expect our suppliers to comply with the standards stipulated in this Code of Conduct when carrying out their business activities.

Suppliers

Our suppliers are the most important partners in ensuring that the efforts we apply throughout our supply chain are also applied by their suppliers throughout their supply chain. If a supplier fulfill our pillars of responsible procurement, they also embark on a path of continuous improvement together with us.

Furthermore we expect from our suppliers, business relations and customers that they denounce any form of unlawful dispossession of land, of forests and waters.

Legal Compliance

We respect and obey the applicable laws, rules and regulations in the countries in which we do business.

Avoiding Conflicts of Interest

Employees should not engage in activities that could give rise to a conflict, or give the appearance of a conflict, between the personal interests of the employee and



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those of the company.

Competing Fairly

Etigam B.V. is committed to conducting its business in compliance with applicable competition and antitrust laws worldwide.

Communications

The Company's goal is to provide complete, fair, accurate and timely communications to investors, analysts, shareholders, the public and other stakeholders.

Reporting Ethical Concerns

In all of the company's operations, employees strives to create an environment in which employees feel safe to ask questions, raise concerns or report Ethics Guide violations.

By sharing this document with our business partners, customers, and suppliers, we expect them to take responsibility and comply with state requirements, as these points are fundamental to living, interacting, communicating, conducting business, and working in a safe environment.

This Code of Conduct will be periodically reviewed and is subject to updates.

For more information, please contact us info@etigam.nl