CODE OF CONDUCT

MEDCOR BV · Hooiwegel 14, 9070 Heusden-Destelbergen, Belgium · VAT BE 0712.550.815 · staelshendrik@medcor.be · www.medcor.be

1. Purpose and scope

This Code sets out how MEDCOR BV ("MEDCOR") does business. It applies to its managing director, associates and subcontractors ("MEDCOR personnel") in all assignments, statutory roles, trainings and other activities. It complements MEDCOR's General Terms and Conditions and its Information Security Policy (MEDCOR-POL-001). Where a client's code or the law sets a stricter rule, the stricter rule applies.

2. Patients first

Patient safety and product quality come before commercial interests. MEDCOR personnel act whenever they have doubts about the safety, quality or compliance of a product or activity. Adverse event reports and product complaints concerning a client's products are forwarded to the marketing authorisation holder or manufacturer within 24 hours, or within any shorter timeline agreed with the client.

3. Independence in statutory roles

Decisions taken in a legally designated role, such as Qualified Person, Responsible Person (GDP), Responsible for Information and Publicity or PRRC, are based solely on the applicable legislation and on patient safety, never on commercial pressure, deadlines or fees. MEDCOR may refuse or postpone a release, approval or sign-off when compliance cannot be confirmed, and records the reasons.

4. Integrity and anti-bribery

MEDCOR never offers, promises, gives, requests or accepts any advantage to improperly influence a decision, whether of a public official, an inspector, a notified body, a client or a supplier. Cash and cash equivalents are never given or accepted. Gifts and hospitality are only offered or accepted when modest in value (indicatively up to € 50), occasional and transparent, and never during a selection, audit or approval process.

5. Healthcare professionals and advertising

Information and advertising for medicinal products and medical devices, and interactions with healthcare professionals, comply with the applicable legislation, in Belgium in particular the Law of 25 March 1964 on medicinal products and the Royal Decree of 7 April 1995, and with the deontological codes of pharma.be and mdeon. Materials are accurate, balanced and consistent with the approved product information. Prescription medicines are never promoted to the public.

6. Conflicts of interest

MEDCOR personnel work for several clients, some of which may be competitors. Any situation in which personal, financial or other client interests could influence professional judgement is disclosed in advance to the clients concerned. Where a conflict cannot be managed, the assignment is declined or ended.

7. Confidentiality and fair competition

Client information is handled in line with article 10 of MEDCOR's General Terms and Conditions and with the Information Security Policy. Information obtained from one client is never used for, or shared with, another client. Competitively sensitive information, such as prices, tenders, launch plans or strategies, is never passed between competitors through MEDCOR. Deliverables made for one client are not reused for another; MEDCOR works from its own templates or from those provided by the client.

8. Honest information and data integrity

Information provided to competent authorities, notified bodies and clients is truthful, complete and not misleading. Records are attributable, legible, contemporaneous, original and accurate; they are never backdated, altered without trace or destroyed before the end of their retention period. Mistakes are reported and corrected openly.

9. Competence and quality

MEDCOR only accepts assignments within its competence and capacity. Personnel keep their qualifications and their knowledge of legislation and guidance up to date, work according to documented procedures and apply a four-eyes principle to critical deliverables. Associates work under supervision until they are qualified for the task.

10. Respect, fair dealing and sustainability

MEDCOR treats clients, colleagues, authorities and partners with respect and does not tolerate discrimination, harassment or intimidation. Associates and suppliers are engaged under clear written agreements and paid on time. MEDCOR limits its environmental footprint by working digitally and remotely where possible and by combining travel.

11. Communication and social media

MEDCOR personnel speak on behalf of a client only when authorised to do so. Client information is not shared on social media or in public.

12. Speaking up

Anyone who suspects a breach of this Code, of the law or of a client's requirements raises it with the managing director without delay. Concerns about the managing director may be raised directly with the client concerned or with the competent authority. No one is penalised for raising a concern in good faith.

13. Acknowledgement and review

MEDCOR personnel read and acknowledge this Code in writing, by email, before starting work for MEDCOR. Breaches may lead to removal from an assignment or termination of the agreement. This Code is owned by the managing director and reviewed at least once a year, together with the Information Security Policy.