

Global Policy for Code of Ethics and Business Conduct

Effective: October 27, 2023

1. Application

This policy applies to Veranova (“Veranova” or “Company”) employees, anyone doing business for or with Veranova, and others acting on Veranova’s behalf regarding the development, marketing, or sale of Veranova products globally (collectively, “you”).

2. Purpose of Policy

Veranova is committed to providing a positive work environment with the support of experienced leaders. As a company, we value good judgment and integrity from all employees, trusting and expecting that everyone exercises that good judgment for the benefit of our customers, their patients, and each other.

All Veranova employees should ensure that we strive for excellence every day and do so ethically.

Each employee has the responsibility to ask questions and raise concerns if something doesn’t seem right.

The Veranova Code of Ethics and Business Conduct (“Veranova Code”) clarifies our standards of conduct in potentially sensitive situations: it makes clear that we expect all employees and those doing business with Veranova to understand and appreciate the ethical considerations of their daily decisions, and it reaffirms our expectations for the highest ethical and business practices.

You are expected to read the Veranova Code in its entirety, discuss questions you may have with your immediate supervisor, and complete the acknowledgement of your compliance and understanding when onboarding and/or when requested at periodic intervals. The Veranova Code applies to all employees, contingent workers of Veranova and its affiliates (each is referred to as the “Company”), as well as all individuals and entities doing business with or on behalf of Veranova. It is important to the success of the Veranova Code that each and everyone understands that:

- We should help to safeguard the Company’s reputation for integrity in our business dealings.
- We are each personally responsible for our own conduct in complying with the Veranova Code as it pertains to our roles with the Company.
- We are responsible for promptly reporting known or suspected violations to designated individuals.
- We should seek help when we have questions about the Veranova Code or when faced with a challenging ethical situation.



- No one has the authority or right to order, direct, request, encourage, or even influence someone else to violate the Veranova Code or the law. Thus, no one will be excused for violating the Veranova Code or the law at the direction or request of someone else.
- Any attempt by an employee or other individual to have someone else violate the Veranova Code, whether successful or not, is itself a violation of the Veranova Code and may be a violation of the law.
- Any retaliation or threat to retaliate against an employee for refusing to violate the Veranova Code or for reporting a suspected violation of the Veranova Code is itself a violation of the Veranova Code and may be a violation of the law.

Every report of a suspected violation of the Veranova Code will be investigated and any violation will be assessed for disciplinary action, up to and including immediate dismissal of the employee.

3. Overview

Veranova's guidelines for business conduct flow from our commitment to excellence, and our long-standing ambition to doing the right thing. These key elements are of paramount importance for proper conduct and respect for all individuals, and successful, safe and ethical business operations.

Veranova depends on the character of its employees. That character is reflected in our company values. This includes attracting and recruiting quality, knowledgeable, honorable people with leadership skills and a passion for doing their best. We value our customers, vendors, suppliers, employees, and communities, and we strive to treat each of them with respect and to be service oriented in our interactions.

Each individual and entity is expected to demonstrate the highest legal, moral, and ethical standards of honesty, integrity and fairness when conducting all Veranova business dealings. All employees of the Company must always act in full compliance with all applicable federal, state, and local laws, ordinances, regulations, and in compliance with the Veranova Code. The failure to do so (or the failure to report promptly suspected violations of law or the Veranova Code) may result in disciplinary action, up to and including termination of employment. Certain business activities may not be governed clearly by any law, and some laws and regulations may have standards below the expectations of the Company. In these situations, you should be able to answer, "yes" to the following questions before taking action:

- Is this action the "right thing to do"?
- Would this action withstand public scrutiny?
- Will this action uphold Veranova's reputation as an ethical company?

If the answers are not a definite "yes," the employee should not take that action. If a course of action seems questionable, please seek guidance from your supervisor, General Counsel or a Human Resources professional. We encourage open



communications regarding possible violations of the Company's ethical principles and business practices.

4. Reporting Suspected Problems

If you have questions about an ethical situation, you should feel free to discuss them with a supervisor, a trusted leader in the organization, Legal Department or Human Resources Professional. You will be assured confidentiality to the limit of the law and subject to the Company's need to investigate and take appropriate action with respect to suspected violations of the Veranova Code, Company policies, or the law. If you do not wish to identify yourself when reporting a violation or suspected violation of the Veranova Code, you may use the Veranova Speak Up Helpline, which allows for confidential and anonymous reporting (please also refer to the Veranova Speak Up Policy, available on the Veranova website). In addition to any concerns you may have regarding a violation of the Veranova Code, the Speak Up Helpline may be used to report potential violations of a Company policy or procedure, accounting matters, internal accounting controls, auditing matters, environmental and/or health and safety concerns, or any other legal concern.

The Speak Up Helpline and online reporting portal are available for use by all employees through an independent third party called Convercent, by OneTrust. If you are making an anonymous report of a violation or suspected violation of any of the items listed above, please supply enough detail to allow the Company to investigate the matter properly.

Toll-Free Speak Up Helpline:

US: (800) 461-9330

UK: 0-(808)-189-1053

Online reporting portal:

www.convercent.com/report

It is against the Company's policy to retaliate against any employee, officer, or director who submits a good faith report of a suspected violation of the Veranova Code. If you feel you have been retaliated against for making a good faith report, you should promptly contact your supervisor, General Counsel or a Human Resources Professional or the Speak Up Helpline.

5. Personal Behavior and Respect for the Workplace

Veranova is committed to providing a respectful, positive environment, and fair treatment to all employees. Dignity and mutual respect are at the heart of our interactions with each other, our business partners, and anyone we encounter in a business setting.



The Company strives to provide a safe, healthy, and productive work environment. Each employee has a personal responsibility to other employees and to the Company to help eliminate actions or circumstances that undermine this desired environment. Veranova does not tolerate discrimination against job applicants or employees because of, or because of the perception of, race, religion, creed, color, national origin, ancestry, citizenship status, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, or military and veteran status, or any other protected status in accordance with all applicable federal, state, and local laws.

Employees having questions or concerns regarding application of these principles to the workplace are encouraged to bring them to a supervisor, a trusted leader in the organization, General Counsel or a Human Resources Professional.

Additionally, every employee is expected to perform their work in a safe manner, free of the influence of alcohol, illegal drugs, or controlled substances. For additional information, please refer to the Company's separate policy regarding drugs and alcohol.

6. Conflicts of Interest

Avoid any situation in which your personal interests' conflict with Veranova's interests. Employees must avoid situations where their personal interests could inappropriately influence, or appear to influence their business judgment.

Conflicts may arise when an employee or a member of their immediate family receives improper personal benefits because of the person's position with the Company. Each employee owes Veranova a duty of loyalty. For that reason, all employees must exercise great care any time their personal interests' conflict with the Company's interests.

The Company will take necessary steps to avoid improper reporting relationships and will not allow employees to directly or indirectly supervise or report to persons with whom they have a family or a close personal relationship without disclosure to and approval from HR. Employees must not allow romantic or personal relationships or friendships with other employees to impair their job performance, adversely affect others, or create a hostile work environment for others.

Employees can engage in outside activities of their own free choice. It is important, however, that such activities do not adversely affect the conduct of Company business, involve misuse of Company position or resources, divert for personal gain any business opportunity from Veranova without prior notification and prior approval from Company management, or constitute a potential source of discredit to the Veranova name. The following is a nonexclusive list of examples of prohibited conflicts of interest:

- Conducting Veranova business with a family member, significant other, or close friend;



- Having a substantial equity, debt, or other financial interest in any competitor, customer, or supplier;
- Having a financial interest in any transaction involving the purchase or sale by Veranova of any product, material, equipment, services or property;
- Misusing the Company's confidential proprietary information, including the unauthorized disclosure or use of such information;
- Using Company materials, equipment, or other assets for any unauthorized or undisclosed purpose; or
- Receiving loans or guarantees of obligations from the Company without authorization.

The Company policy regarding conflicts of interest is based on the principle that an employee's business decisions must be made solely in the best interests of Veranova. To reach that decision, an employee should avoid influence from personal or family considerations that might affect their judgment as to what is in the best interests of the Company.

Even the perception of a conflict of interest can have negative consequences. When you disclose a potential conflict of interest to your manager or supervisor, you protect yourself and Veranova. If you think you have or are aware of an actual or potential conflict of interest, disclose it immediately to your manager, Legal, HR, or using the Speak Up Helpline. Disclosing conflicts of interest as soon as possible helps us maintain our culture of integrity.

7. Bribery

Our key values of fairness and integrity are central to our sustainable business growth around the world. We never gain or keep business through unethical means, such as bribes, kickbacks, or other corrupt practices – regardless of any local business custom. We comply with the U.S. Foreign Corrupt Practices Act, UK Bribery Act, and any local anti-corruption laws that apply to us. We must not accept or provide bribes and we must be especially careful when working with government officials. It is illegal to offer, promise, give, or accept anything of value to a business partner or government official that could illegally influence them.

8. Working with Third Parties

It is important to us that we know who we are working with, so we have policies in place which require us to screen customers, suppliers, agents, distributors and other third parties. By doing so, we satisfy ourselves that third parties with whom we do business are of good repute. We screen agents and distributors to establish their ownership and management structure and require them to demonstrate that they have effective controls in place to prevent bribery and corruption. We also require them to abide by ethical standards of business no less rigorous than those set out in this Code.



Veranova will not engage in business activities with individuals or companies that are debarred, suspended, or proposed for debarment or suspension, or otherwise, excluded from award of US and other government contracts. All customers, suppliers, agents, distributors and other third parties must promptly notify us in writing if it is subsequently debarred, suspended, or proposed for debarment or suspension.

9. Communication Procedures

You may not communicate externally on behalf of the Company unless you are authorized to do so.

The Company has established specific policies and procedures regarding who may communicate information to the public, the press, market professionals on behalf of the Company.

You should refer outside inquiries, including any from the press or other external media sources, to the Director of Strategic Marketing and Communications or the General Counsel whenever you are approached by a person outside Veranova to comment or make a statement on behalf of the Company.

10. Receipt of Gifts / Hospitality

Veranova does not offer or accept kickbacks, bribes, or gifts of substantial value.

Employees may only exchange non-monetary and modestly valued gifts that promote goodwill with our business partners and do not improperly influence others. We will accept only approved and widely available discounts. Employees may give or receive gifts or hospitality in Company-related business dealings with customers or suppliers provided the following guidelines are met:

- They do not violate the law, regulations - or reasonable, accepted customs and practice of the marketplace, or the known policy of either party's employer;
- They are reasonable in cost, amount, quantity, and frequency (a supervisor must approve in writing any gift with a value of \$100 or greater, in equivalent local currency);
- They are appropriate as to time and place;
- They do not influence or give the appearance of influencing the business judgment of the recipient; and
- They can stand public scrutiny without damaging the Company's reputation.
- All gifts and hospitality given or extended must be reported in compliance with the Veranova Travel & Entertainment policy applicable at each Veranova site.

Gifts and hospitality include, but are not limited to gifts, meals, alcoholic drinks, discounts, hospitality, entertainment, recreation, promotional items, transportation and any tangible or intangible "item of value" for which the recipient does not pay fair market value. Keep in mind, if a gift feels excessive, then it probably is. Employees may not resell gifts or hospitality for profit at any time.



Veranova may conduct periodic audits of gift and hospitality given or received and any suspected violation of the Veranova Code will be investigated. Any violation will be assessed for disciplinary action, up to and including immediate dismissal of the employee.

11. Fair Dealing with Competitors, Customers and Vendors

Veranova respects the rights of competitors, customers, and vendors. The Company's success depends on building productive relationships with customers, vendors and where appropriate, competitors. These entities have their own requirements and expectations, many representing opportunities for mutual success. The Company bases its supplier relationships on fundamental concepts of integrity, ethical dealings, nondiscrimination, and mutual trust and respect. The Company will not engage in activities with customers, vendors, or competitors that violate applicable competition laws or that otherwise unfairly prevent or limit competition or could appear to do so.

12. Forced Labor and Human Trafficking

Veranova complies with all applicable laws and employment regulations and does not engage or participate in forced labor. We have those same expectations of all entities doing business with Veranova. Human trafficking or "modern slavery" is something we do not accept.

13. Intellectual Property and Other Assets

One of Veranova's most important assets is its confidential, proprietary corporate information. Confidential and proprietary information is critical to our competitive advantage. Employees have an obligation to protect this information - it must not be shared with others outside the Company and, depending on its status, such as trade secret, may only be shared within the company under guidance from Legal and IP. We must also respect the confidential information of our business partners, suppliers, and other third parties.

- You agree not to directly or indirectly disclose, record, or in any way make use of Veranova confidential and proprietary information except: (a) as required in and limited to the performance of my duties and responsibilities as an employee of Veranova and under conditions that protect the Veranova confidential and proprietary information consistent with the terms of this Veranova Code; or (b) to the extent you are required by subpoena or similar process to disclose or discuss any Veranova confidential and proprietary information; provided, that, in such case, you shall promptly inform Veranova of such event and shall cooperate with Veranova in attempting to obtain a protective order or to otherwise restrict such disclosure. Unauthorized use or



distribution of confidential and proprietary information violates Company policy.

- Rights in Proprietary Information. All Veranova confidential and proprietary information, including all patents, patent rights, copyrights, copyrightable works, trade secret rights, trademark rights, and other intellectual property rights anywhere in the world related to Veranova business interests, are, and shall be, the sole and exclusive property of Veranova. You assign to Veranova any rights you have or may acquire in any and all Veranova Proprietary Information you develop or derive in connection with your employment at Veranova. Examples of Company confidential and proprietary information includes, but is not limited to, intellectual property rights (as above), business, marketing, and service plans, strategic marketing/growth plans, engineering, and manufacturing ideas, product concepts, promotional ideas/concepts, designs, databases, records, wage/salary information, and any unpublished financial data and reports.
- Return of Proprietary Information. You agree to deliver all tangible Veranova confidential and proprietary information in your possession, including all tangible and electronic copies thereof, along with any other Veranova property, to Veranova on or before your last day of employment or engagement with Veranova. You further agree thereafter not to make any written record or use of such Veranova Proprietary Information.

Every Veranova employee is required to protect the Company's confidential and proprietary information as well as that of its suppliers and third parties who disclose information to Veranova in confidence. Such disclosure (in or out) should only occur under a Confidential/Non-Disclosure Agreement or similar document unless you receive specific permission from Legal. No Veranova employee may accept trade secrets or confidential information of a technical or business nature from a third party, unless the employee has received prior and specific authorization from their immediate supervisor to do so. Should an inadvertent disclosure occur, you must seek out a member of the Legal Department for proper handling.

14. Protection and Use of Company Property

Our key stakeholders trust us to manage Company assets appropriately.

We must ensure that Company equipment, supplies, and other assets are used for legitimate business purposes unless otherwise specifically authorized by an employee operating under Veranova Delegation of Authority Policy, and that we protect all tangible and intangible Company property.

All employees should endeavor to protect the Company's assets and ensure their efficient use.

Theft, carelessness, and waste have a direct impact on the Company's profitability. Any suspected incident of fraud or theft should be immediately reported to a



supervisor, a trusted leader in the organization, General Counsel, or a Human Resources Professional. Company equipment should not be used for non- Company business, though incidental personal use may be permitted depending on the circumstances surrounding such use.

15. Environmental Compliance

Veranova will conduct business in compliance with appropriate environmental laws and regulations. It is Company policy to operate its facilities in a manner intended to protect its employees, the public, and the environment. Environmental impacts, such as water usage, waste production, greenhouse gas emissions, and carbon footprint, are tracked regularly and reviewed for compliance and to look for more sustainable options.

16. Employee Personal Information

We will collect and retain personal information from employees that is required for the effective operation of the Company or that may be required by law. We will keep that information confidential and release it only to persons who have a legitimate need to know or are legally authorized to receive the information.

17. Financial Records

Each employee must help maintain the integrity of Veranova business and financial records. The Company's business records are vital to the preparation of reliable and accurate reports to management, key stakeholders, creditors, governmental entities, and others. Thus, all official records of the conduct of the Company's business must be accurate, reliable, and complete, without any restriction or qualification of any kind. This means the accuracy of any records involves both factual documentation and ethical evaluation or appraisal.

The Company requires reliable and accurate recording and reporting of information to make responsible business decisions. For example, only the true and actual number of hours a person works should be reported. Further, no employee who is classified as non-exempt should be working hours without receiving the required hourly wage (sometimes referred to as "off-the-clock"). Finally,

many employees use business expense accounts, which must be documented and recorded accurately and in accordance with Veranova policies.

If you are not sure whether a practice or expense is legitimate, talk to a supervisor, a trusted leader in the organization, Legal, or a Human Resources Professional.

All the Company's books, records, accounts, and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions, and must conform both to applicable legal requirements and to the



Company's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulation.

Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to e-mail, internal memos, presentations, and formal reports. Records should always be retained or destroyed according to the Company's record retention policies.

All Company operations must comply with all local and national laws relating to the accurate and complete maintenance of Company financial books and records.

Employees are expected to be reliable, objective, and loyal in the performance of record keeping responsibilities. This includes properly recording all sales transactions in all point of sales systems. Because loyalty includes never knowingly being a part of any illegal or unethical activity, there is no excuse for a deliberately false or misleading Company record.

While only a few employees maintain actual accounting records, many people help keep the Company's records. Whether an employee conducts and reports inventory levels, uses business expense accounts, or pays vendors for services rendered, accurate documentation is critical. Employees may not participate in any misstatement of the Company's accounts. At the same time, no circumstances justify "off-the-books" accounts to facilitate questionable or illegal payments. All transactions under which funds are disbursed shall accurately state the purposes for which these funds are paid and shall not be misleading.

18. Contact with Government Officials

Veranova will comply with all applicable laws, rules and regulations relating to lobbying or attempting to influence government officials.

Information provided to the government must be accurate and interactions with government officials must be ethical and in good faith. All activities that might constitute lobbying or attempts to influence government officials must be reviewed first with Legal.

If your job involves business with foreign, national, state, or local government, you must know the rules applicable to your job. If you are in doubt, do not make the mistake of interpreting rules by yourself. Discuss the matter with Legal, your supervisor or other management of the Company.

19. International Business

Some of Veranova's business involves the movement of goods, technology, services, data and money across international borders. These movements may be subject to export/import licensing requirements (even to another Veranova facility or employee), end user/use restrictions, country embargoes, prohibitions on dealings



with restricted individuals and/or entities on various government lists, and customs/tax requirements. Employees of Veranova must abide by all laws and regulations that apply to the import and export of goods, products, and technical data globally.

It is therefore very important to understand the following:

WHAT is being imported or exported (product classification)? Is it product or technical data? Has it been properly classified?

WHERE is it going (destination)? Ultimate destination and any intermediate consignees?

WHO are we dealing with (end user)? Are they a “restricted party?” Have they been screened through the Veranova restricted party screening software?

HOW will they use it (end use)? Is the end use controlled? Has the customer completed an end user/use certification?

Further, it is also important to recognize the red flags in a transaction:

- Customer's name or address is similar to one of the parties found on a denied party list.
- Customer or purchasing agent is reluctant to offer information about the end use or does not understand the product capabilities.
- Product does not fit the buyer’s line of business.
- “Ship to” address is a freight forwarder, private residence, apartment building, or a Free Trade Zone.
- Unusual routing to the ultimate destination.

We also comply with anti-boycott and international embargo regulations in all locations where Veranova does business. The U.S. Foreign Corrupt Practices Act and the UK Bribery Act, among other laws, prohibit payments, gifts, or contributions to officials of any foreign government or government-owned business for the purpose of getting or retaining business. In addition, these laws require Veranova to maintain accurate and complete financial books and records.

20. Public Disclosure of the Code

The existence and content of the Veranova Code will be disclosed to key stakeholders and will be available on the Company’s website.

21. Coordination with Other Company Policies

The provisions of the Veranova Code are in addition to, and do not modify, replace, or supersede, other Company policies or procedures and are to be construed consistently with such policies and procedures including, but not limited to, other Company statements of policy or procedure, whether written or oral. If you have



questions regarding anything you believe may be inconsistent with respect to these documents, please contact a supervisor, Legal or a Human Resources Professional.

Additionally, the Veranova Code is not intended to be and does not constitute a contract of employment between the Company and its employees.

22. Conclusion

A central goal of the Veranova Code is to serve as an ongoing reminder of Veranova’s policy of conducting its business in a reliable, decent, and appropriate manner. This includes not only complying with all applicable laws, but also treating Veranova’s customers, employees and vendors with dignity and respect.

If you or your co-workers have an ethics question, talk to a supervisor, a trusted leader in the organization, Legal, or a Human Resources Professional. If you feel your question was not adequately answered, or if you otherwise wish to make an anonymous report of a violation or suspected violation of the Veranova Code, contact the Veranova Speak Up Helpline or reporting portal.

23. Approved By

<i>Date</i>	<i>Name</i>	<i>Title</i>
10/27/2023	Veranova Quality, Safety and Compliance Committee of the Board of Directors	Approval

24. Issue Date

<i>Date</i>
12/1/2023

25. Revision History

<i>Date</i>	<i>Version</i>	<i>Author</i>	<i>Description of Changes</i>
10/22/2023	Draft	General Counsel	Draft