Vitalograph Group ("Vitalograph") Global Supplier Code of Conduct

At Vitalograph, we believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business. Vitalograph has developed this Global Supplier Code of Conduct ("Supplier Code") to clarify our global expectations in the areas of business integrity, labour practices, employee health & safety and environmental management.
Vitalograph's Modern Slavery Statement and commitment to ethical practices can be found here: vitalograph.com/compliance-and-employment-statements

Suppliers, vendors, and other providers of goods and services who do business with Vitalograph worldwide ("Suppliers") are expected to follow this Supplier Code. With prior notice, Vitalograph may conduct reasonable audits to verify Supplier's compliance with Supplier Code and may ask Supplier to provide evidence of their compliance.

Vitalograph expects its Suppliers to conduct business responsibly, with integrity and, honesty. Suppliers are expected to adhere to our values, to the following principles and to apply these in their supply chain:

1. **Maintain awareness of, and comply with, all applicable laws and regulations**
   Suppliers shall maintain awareness of, and comply with all applicable laws and regulations.

2. **Compete fairly for business, without paying bribes or giving anything of value to secure an improper advantage.**
   Vitalograph is committed to conducting business legally and ethically within the framework of a free enterprise system. Corrupt arrangements with customers, suppliers, government officials or other third parties by Suppliers are strictly prohibited. "Corruption" generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage (for yourself or third parties) through dishonest or illegal means.

3. **Encourage a diverse workforce and provide a workplace free from discrimination, harassment or any other form of abuse.**
   Suppliers shall create a work environment in which employees and business partners feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Suppliers shall not discriminate in employment, including with regard to hiring, compensation, advancement, discipline, termination and retirement, in violation of the laws and regulations, including on the basis of alienage or citizenship, age, colour, creed, disability, gender identity, genetic characteristics, marital status, domestic violence victim status, military status, national origin, pregnancy, childbirth- and pregnancy-related medical conditions, race, religion, sex/gender, sexual orientation, or veteran status.

4. **Treat employees fairly, including with respect to wages, working hours and benefits.**
   Suppliers shall comply with all applicable laws and regulations and will generally sound employee relations practices. Working hours, wages and benefits will be consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation and legally mandated benefits.

5. **Prohibit all forms of forced or compulsory labour.**
   Supplier shall maintain and promote fundamental human rights. Employment decisions will be based on free choice and may not involve forced or prison labour, physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control. Supplier shall not charge recruitment fees to its workforce as the costs of recruitment should be borne by the employer.

6. **Prohibit use of child labour**
   Suppliers shall adhere to the minimum employment age limit defined by the applicable laws or regulations and comply with applicable International Labour Organization standards. In no instance shall a Supplier permit a child to perform work that exposes them to undue physical risks that can harm physical, mental or emotional development or improperly interfere with their schooling needs.

7. **Respect employees' right to freedom of association and collective bargaining, consistent with applicable laws and regulations.**
   Consistent with applicable laws and regulations, Suppliers shall respect employees' rights to join or refrain from joining associations and worker organisations. Supplier will permit workers to openly communicate and share grievances with management about working conditions and management practices without fear of reprisal, intimidation or harassment.

8. **Provide safe and healthy working conditions**
   Suppliers shall proactively manage health and safety risks to minimised occupational injuries and illnesses. Suppliers must implement management systems and controls that identify hazards, assess and control risk related to their specific industry.

9. **Carry out operations with care for the environment and comply with all applicable environmental laws and regulations.**
   When making business decisions, Suppliers are to consider the potential environmental impact of their activities along with opportunities for conservation of natural resources, recycling, source reduction, and pollution control to ensure cleaner air and water, and to reduce landfill wastes.

10. **Conflict Minerals**
    Suppliers are expected to ensure that products supplied to Vitalograph do not contain metals (including but not limited to tin, tungsten, tantalum and gold) derived from conflict minerals regions that directly or indirectly finance, or benefit armed groups (including but not limited to the Democratic Republic of the Congo or an adjoining country, correct as of December 2025).

11. **Maintain accurate financial books and business records**
    Suppliers shall maintain accurate financial books and business records in accordance with all applicable laws and regulations and accepted accounting practices.

12. **Deliver products and services meeting applicable quality and safety standards**
    Supplier shall have adequate controls in place to ensure the integrity quality and safety of their products and services provided by Supplier to Vitalograph.

13. **Support compliance with this Supplier Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by Vitalograph.**
    Suppliers shall establish appropriate management processes and maintain records to comply with this Supplier Code. With prior notice, Vitalograph may conduct reasonable audits to verify Supplier's compliance with Supplier Code.

14. **Prohibit gifts and entertainment to Vitalograph employees**
    Suppliers are prohibited from providing or offering gifts or entertainment to Vitalograph employees that could inappropriately influence Vitalograph's business decisions or gain an unfair advantage.

15. **Consider how purchasing practices could unintentionally put pressure on the supply chain**
    Suppliers should be aware of the potential impacts that their sourcing and procurement methods can have on modern slavery risks, for example aggressive pricing not considering sustainable production costs, late high-volume orders, inaccurate forecasting, late or extended payments.

16. **Report suspected violations of this Supplier Code**
    Suppliers' employees or agents may report suspected violations of this Supplier Code to **michael.ryan@vitalograph.ie and legal@vitalograph.co.uk**. All such reports are treated as confidential, where permitted by law, and the reporter may remain anonymous, where permitted by law. We note that anonymous report or call may be more difficult to investigate.

Acknowledged and Agreed:

Print Name of Supplier: _____

By: _____
(Authorised signatory)

Name:
Title:
Date: