



CODE OF CONDUCT

Your questions are worth asking
Find the answers in the PTS-MED Code of Conduct

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Introduction to the Code of Conduct

Message from the CEO

I'm very pleased to present PTS-MED's Code of Conduct, revised and updated to reflect the fast-changing world in which we are operating as well as our decentralized business model. To grow and be successful, PTS-MED depends on the trust of its employees, customers and shareholders, as well as the communities and societies that it serves. The bedrock of that trust is integrity an uncompromising commitment to adhere to the highest standards of ethical business conduct.

At a time when technological advances are accelerating and speed is a key competitive advantage, our Code reflects our collective and individual commitment to integrity. It provides practical guidance on how we conduct business world-wide and helps us make the right decisions in ambiguous or complex situations.

The Code requires us to be fair, honest and respectful in our dealings with others, to comply with all applicable laws and regulations, and to promptly report suspected violations of the Code. Beyond that, we follow safe and healthy work routines, adopt sustainable and environmentally sound business practices, and respect human rights.

The Code applies to all of us and we are committed to holding each other accountable for our actions. PTS-MED leaders have a special responsibility to lead by example, to anticipate and take action to mitigate risks, and to ensure that integrity is a defining characteristic of our organizational culture. PTS-MED employees have an obligation to read, understand and adhere to the Code and, by doing so, contribute to making the company a better workplace for everyone. To ensure that employees and other take holders feel free to raise concerns about potential violations, the Code contains a commitment against retaliation.

Let's work together to make sure that the Code of Conduct reflects who we are as a company and as individuals, and that it helps to advance PTS-MED as a technology leader and an exemplary corporate citizen.

Thank you.

Giorgio Lacagnina
CEO PTS-MED

Why do we have a Code of Conduct?

PTS-MED's employees work different countries, come from many different cultural backgrounds and speak dozens of languages.

We are proud of our global workforce and its diversity gives us a competitive advantage. Despite our differences, PTS-MED employees all share a defining sense of personal integrity that guides our behaviour in the markets where we do business and sets us apart from our competition. Our Code of Conduct expresses our strong collective and individual commitment to integrity and provides practical guidance to our workforce, our suppliers and business partners in how we conduct business worldwide.

We live in a fast-paced and ever-changing world where technology continues to transform our work. Complex and often confusing laws and regulations govern our global business. Customers seek faster, more comprehensive and simpler solutions. In this exciting period of accelerating change, we want our Code of Conduct to be a clear reminder of our constant pledge to be accountable and act always with unyielding integrity.

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Where the Code of Conduct applies

PTS-MED's Code of Conduct applies globally to all of PTS-MED's employees, managers, officers and directors, including PTS-MED's wholly-owned affiliates and subsidiaries. In addition, the Code of Conduct applies to every employee of a joint venture or other entity in which PTS-MED has majority ownership interest or exercises effective control, for example, through the board of directors.

In companies where PTS-MED does not own a majority share or otherwise exercise control, PTS-MED will make a good faith effort to have the company adopt the PTS-MED Code of Conduct (assuming there is no adequate Code of Conduct already in place) or a similar set of integrity policies and procedures. PTS-MED will do its best to have its suppliers, contractors and other representatives acknowledge and adhere to PTS-MED's Supplier Code of Conduct or apply a similar set of integrity policies and procedures with respect to business with PTS-MED.

To grow and be successful, PTS-MED depends on the trust of its employees, customers and shareholders, as well as the communities and societies that it serves. The bedrock of that trust is integrity – an uncompromising commitment to adhere to the highest standards of ethical business conduct.

Five integrity principles

1 – We behave and do business in an ethical way

2 – We work in safe and sustainable way

3 – We build trust with all stakeholders



4 – We protect **PTS-MED's** assets and reputation

5 – We speak up and do not retaliate

We communicate in a respectful, honest, transparent and professional manner. Our communications reflect our reputation and brand as a forward-thinking technology leader. Whether communicating internally or externally, regardless of the medium or channel, we protect PTS-MED's confidential data, provide comprehensive and accurate information, and always support open discussions and dialogue.

Keep in mind

- Use all communication channels responsibly. Ensure the content being communicated is business appropriate, non-confidential and constructive.
- Our workplace is not a public place. Please presume that the information and content that we hold or generate is business - confidential or protected by law. Disclosing internal materials (such as PTS-MED's know-how, trade secrets, methodology, organizational charts, business plans and similar information), could result in civil or criminal liability for you or the company.
- Before communicating, please consider whether the content might be perceived as discriminatory, offensive, harassing, threatening or defamatory.
- Timely and responsive business communication is vital. If you are not able to answer promptly, inform the others involved when you will be able to respond.
- We communicate across languages, time zones and cultures. Be aware of time differences, act sensitively and remember that those who speak other languages may interpret your message differently than you intended.

Your role

- Familiarize yourself with PTS-MED's internal guide-lines and regulations for communications, branding and social media. If you are not sure whether certain material is appropriate to communicate, ask your local communications manager .
- If you are contacted by a member of the news media about PTS-MED, always refer that person to the media relations department or an authorized company spokesperson. It is important that we speak with one voice about the company.
- If you make an error in communicating information online or on social media, please correct it promptly. Be sure to indicate transparently that a correction has been made.
- Inappropriate communication might lead to difficult situations. In case you find risky content on internal or external channels, please contact your local communications manager.

Communications

“What’s the same inside and out?”

Whether communicating internally or externally, regardless of the medium or channel, we protect PTS-MED's confidential data, provide comprehensive and accurate information, and always support open discussions and dialogue.



We are committed to act in the best interests of PTS-MED. We use PTS-MED's property and information only for proper and legitimate business purposes and we make decisions independently of personal interests. We disclose promptly any personal or professional interests that might reasonably be perceived to conflict with the best interests of PTS-MED, create an appearance of impropriety or affect our judgment in carrying out our roles at PTS-MED. We avoid external engagements or activities that might interfere with our responsibilities to PTS-MED or harm PTS-MED's reputation.

Keep in mind

- A conflict of interest s may be actual or apparent and you should ask yourself whether a colleague who is aware of your personal interests might reasonably call into question the integrity of your business decisions.
- Even the appearance of a conflict of interests can create unnecessary problems for you and PTS-MED, including potential harm to reputation, trust and morale.
- Having a conflict of interests – or the appearance of a conflict of interests – is not a violation of the Code of Conduct in itself. However, your failure to disclose the potential conflict promptly is a violation and may lead to disciplinary action.
- Conflicts of interests arise in many common situations – for example, you may have a close relative who works at an PTS-MED vendor, customer or competitor or you may serve on the board of a charity to which PTS-MED donates or may support in the future.
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Your role

- If you are unsure whether you have either an actual or apparent conflict of interests, the best course of action is to disclose it according to PTS-MED's Corporate Regulation on conflicts of interests so it can be resolved in a fair and transparent manner.
- Whenever possible, seek to avoid situations where you would be placed in a conflict between your personal interests and those of PTS-MED.
- Avoid performing outside work during PTS-MED business hours or using PTS-MED resources or confidential information for such work.
- Do not act in competition with PTS-MED's interests and avoid hiring, supervising or promoting family members or others with whom you have a close personal relationship.

Conflict of interests

“When do interests conflict?”

We disclose promptly any personal or professional interests that might reasonably be perceived to conflict with the best interests of PTS-MED.

We accurately record and report our finances, transactions and assets. We comply with the laws that govern our financial records, accounting principles, tax obligations and financial disclosures. We further comply with laws against money laundering and are vigilant about suspicious financial transactions that may be intended to disguise the proceeds of criminal activity. We protect PTS-MED property, assets and data from improper or unauthorized use and exercise care to avoid their loss, theft or damage. We use PTS-MED assets for legitimate business purposes.

Keep in mind

- Financial records include books and accounts as well as the documents relating to the preparation of such records. Company books and records can also include almost any tangible financial related data.
- Individuals or organizations who launder money seek to disguise the proceeds of criminal activity in legitimate business dealings or to use legitimate funds to support criminal activities.
- Releasing information or data without proper authorization that is confidential, commercially sensitive or contentious may have undesired contractual or other legal implications for PTS-MED.
- PTS-MED's assets, physical or otherwise, can include anything owned or possessed by PTS-MED that provides value for the company, including sensitive data, physical and intellectual property and financial assets.

Your role

- Ensure that all business transactions are fully and fairly recorded in accordance with PTS-MED's accounting principles, internal procedures and applicable laws.
- Do not sign any approval or other document without first verifying its accuracy and ensure that the underlying transaction serves a legitimate PTS-MED business purpose.
- Do not alter or destroy any record that you have been instructed to keep or that is within PTS-MED's document-retention limits.
- Be aware that improper or fraudulent documentation or reporting is illegal and can expose you and PTS-MED to civil and criminal penalties.
- You are responsible for safeguarding and using PTS-MED assets appropriately.
- Report transactions that seem suspicious, including but not limited to:

Requests for PTS-MED to pay in cash or instalments in a foreign currency just below the reporting threshold for foreign currency payments in that country. - **Requests** for a payment to a new, special or individual bank account. A supplier request for an upfront payment to an offshore bank account or to a destination known to be a tax haven. - **An end-customer** that informs PTS-MED that payment will be made through an entity that it has established in another country or through a third party.

Controllershship and money laundering prevention

“What’s still dirty after washing?”

Individuals or organizations who launder money seek to disguise the proceeds of criminal activity in legitimate business dealings or to use legitimate funds to support criminal activities.



We comply with the environmental laws and regulations in the countries where we do business. In addition, we promote sustainable development and strive to achieve PTS-MED's sustainability goals by supporting economic progress, environmental stewardship and social development. We are dedicated to continuous improvement in each of these areas with respect to our products and services by seeking, among other things, to reduce emissions, decrease the use of hazardous substances, and conserve water and energy in the effort to combat the causes and effects of climate change.

Keep in mind

- Our commitment goes beyond existing laws and regulations. We seek to transparently and ethically manage our environmental footprint in the interests of our stakeholders, including our customers, employees, investors and the communities in which we operate.
- We expect our suppliers and business partners around the world to share in our commitment to the protection of the environment.
- We must immediately report dangerous situations or unacceptable environmental conditions so that corrective and preventive actions can be taken.
- Consider the ways that PTS-MED can work to reduce the environmental effects of its products and services throughout their lifecycle, including design, procurement, materials, use and end of life disposition of products.
- PTS-MED has a policy on sustainability and its economic, environmental and social requirements and we expect our employees to be familiar with it and its guidance.

Your role

- Be mindful of the environmental effects that are relevant to your work and how environmental compliance is accomplished in your job or function. Raise with your manager ideas to reduce the environmental impacts of our products and services.
- Watch out for suppliers or other business partners that do not have or do not engage in safe or sustainable environmental practices.
- Ensure that your facility, project or workplace has in place all the necessary environmental licenses or permits before commencing work. If you are not certain that you have all the right clearances, contact the Legal & Integrity team or Health, Safety & Environment team immediately.
- Dispose of waste in accordance with PTS-MED's internal and local processes and applicable laws.
- Promote awareness, ownership and engagement about our environmental risks and sustainability opportunities.

Environment

“What can we raise to reduce our impact?”

Raise with your manager ideas to reduce the environmental impacts of our products and services.

We compete fairly, openly and independently. We comply with antitrust and other laws regulating competition that protect fair competition by prohibiting anti-competitive behaviour and thereby guarantee that our hard work and innovation will be rewarded. These laws prohibit agreements restricting competition between companies at either the same (i.e., competitors) or at different levels of the supply chain (e.g., manufacturer and its distributor), and may impose limits on the commercial behaviour of companies that hold a dominant position in a market. These laws may also require that companies seek approval for other commercial agreements that might affect competition or certain mergers and acquisitions

Keep in mind

- Any discussion, agreement or understanding (direct or indirect) with a competitor on price, on the allocation of products, markets, territories, customers, or bids, on restrictions in production or on collective boycotts is illegal.
- Exchanging with, or signaling to, competitors any information on individualized intentions concerning future conduct regarding prices, quantities or other elements of competitive behaviour is illegal.
- You cannot obtain from, or share with, competitors commercially sensitive information, i.e., information that could influence a commercial decision of PTS-MED or a competitor (e.g., cost, margins, pricing data, future strategies, product plans).
- You cannot agree with, or require, a customer to resell our products at a certain price.
- Exclusive arrangements or other restrictions on a customer's or channel partner's ability to resell in certain markets or to certain customers cannot be imposed without first consulting with the Legal & Integrity team.
- Violation of antitrust and competition laws is a serious matter, and could result in criminal prosecution of you and the company and grave reputational harm to yourself and PTS-MED.

Your role

- Comply with antitrust and other laws regulating competition.
- Be familiar with and follow PTS-MED's Corporate Regulations relating antitrust.
- If you are in doubt whether your business strategy or conduct is compliant with antitrust law, immediately contact the Legal & Integrity team for guidance.

Fair competition and antitrust

“How do we play fair?”

We comply with antitrust and other laws regulating competition that protect fair competition by prohibiting anti-competitive behaviour and thereby guarantee that our hard work and innovation will be rewarded.

We are a global company whose employees come from many different countries, backgrounds and cultures. We believe that our diversity and the engagement of our employees are a source of strength and competitive advantage. Mutual respect and tolerance are fundamental to how we work and communicate with each other. We believe that competence, performance and potential should guide our employment-related decisions, such as hiring, retention, training opportunities and promotion. We follow the applicable employment and labour laws where we do business, including wage & hour, immigration, collective-bargaining, anti-discrimination, and similar employment rules.

Keep in mind

- Employment-related decisions are always based on relevant qualifications, merit, performance, and other job-related factors. Discrimination is not tolerated.
- Workplace bullying and harassment are never acceptable; examples of unacceptable behaviour include using force, threats or coercion –whether verbal, physical or social – to abuse, intimidate or dominate others. Bullying can be committed by individuals or by groups, in person or online, and it can be obvious or hidden.
- PTS-MED updates its employment procedures and guidelines from time to time – please raise promptly with the Human Resources team any employment matter that may require reviewer reconsideration.

Your role

- Lead by example, treating your colleagues with respect and living up to our standards for fair treatment, diversity and inclusion. Join us in making PTS-MED an employer of choice.
- Follow PTS-MED's internal employment procedures and guidance; if you are in doubt, contact the human resources team for answers.
- Employment standards are high and global merely because a law or country may allow or not specifically forbid certain practices in the workplace does not mean you may violate our employment standards.
- Do not use offensive language or make offensive gestures. Likewise, do not make discriminatory remarks even if they are intended as a joke.
- Become familiar with the culture of the country where you are working in order to avoid giving offense.

Fair employment, diversity & inclusion

“What’s equal in all place?”

Employment standards are high and global merely because a law or country may allow or not specifically forbid certain practices in the workplace does not mean you may violate our employment standards.



We operate in a global environment. We comply with applicable trade laws and regulations, including those relating to import and export controls, trade sanctions and customs procedures, and we expect our business partners to do the same. PTS-MED has implemented controls to mitigate risks related to trade and export controls, including appropriate screening of transactions that might involve embargoed or sanctioned countries, processes to facilitate compliance with export control restrictions, and systems and training to ensure accurate declarations to trade authorities.

Keep in mind

- If you initiate –even occasionally – an import or export, you must follow the law of the countries involved. Even minor transactions (low volume, low price range, or even cost-free replacements and/or goods transported for service delivery) are covered by trade regulations.
- Import and export documents must be properly completed, accurate and archived in accordance with PTS-MED's Corporate Regulation on global trade.
- Exports may take many forms and do not only apply to physical items. An export may occur when you carry electronic devices that contain information across a border, when you transmit that information electronically or place it in a collaborative workspace that others may access. Export can also occur when a visiting foreign national views certain controlled information at your site.
- Many countries restrict the export or transfer of certain data and technology. Some countries completely forbid business with certain other countries or parties. An assessment of such transactions is necessary to ensure they do not conflict with applicable trade sanctions and have the necessary government authorizations.

Your role

- Maintain appropriate awareness of the regulations and ensure that you have at least a basic understanding of the most critical trade related concepts that apply to your transactions.
- Ensure that you are familiar with all elements of a transaction, such as the products, parties, end-use and country of destination, and comply with all applicable laws and regulations as well as PTS-MED's Corporate Regulation on global trade.
- Be alert for suspicious transactions and behaviour (red flags) involving unclear or incomplete information from customers or third parties about the end use, delivery locations, or delivery dates. Do not cooperate with any party that seeks to directly or indirectly send goods or data to a prohibited country or party.
- Report to your trade compliance officer any inaccurate descriptions, valuations or classifications of goods or data, and any payments to a customs broker that exceed the invoice or are for unidentified or ambiguously described services.
- Ensure that products and other information are clearly identified, correctly valued and accurately classified with respect to export controls and customs regulations.
- Additional care is required for transactions involving designated sensitive and high-risk countries; ensure that they are properly authorized under PTS-MED's Corporate Regulation on global trade.

Global trade

“When is something not our business?”

Do not cooperate with any party that seeks to directly or indirectly send goods or data to a prohibited country or party!

We are committed to providing a healthy and safe environment for our employees, co-workers and other contractors. We have implemented a robust Health, Safety, Environment and Sustainability Affairs (HSE/SA) Management System and workplace standards that meet or exceed legal requirements in the countries where we do business, and we expect our employees, contractors and suppliers to comply with them. Safety is one of our core values, a bedrock of our organization and central to our operations, products and services.

Keep in mind

- Dangerous situations or unacceptable health, safety or environmental conditions cannot be ignored. Always report these conditions via the hazard or incident reporting modules within the global HSE/SA Management Information System (MIS) or to your manager, so that corrective and preventive actions can be taken to avoid an accident.
- It is prohibited to work under the influence of alcohol, illegal drugs, or even prescription drugs that might interfere with the ability to do the job safely.
- We expect our business partners, suppliers and other contractors to follow the same high standards for safety and health that we do.
- PTS-MED takes health and safety very seriously, and so do our regulators. Understand that there may be serious consequences, including civil or criminal penalties for violations of health and safety regulations.

Your role

- Be sure you understand your required task and that you are comfortable and qualified to fulfil it. Ensure that you follow a safe working procedure, that you have all necessary permits, and that you use the correct tools and protective clothing applicable to the task. Make sure people in your immediate vicinity are aware of what you are doing so they can also take suitable precautions.
- Make health and safety a priority in your workplace and life, including "small" things like wearing seat belts and not driving while distracted. Know and consistently apply the PTS-MED Life Saving Rules.
- Present ideas or recommendations for improving health and safety in our working conditions to your manager.
- Be informed about recommendations from PTS-MED security regarding business travel.
- Be familiar with the procedures for an emergency at your location in terms of safe exit and evacuation procedures.

Health and safety

“What can never be ignored?”

Dangerous situations or unacceptable health, safety or environmental conditions cannot be ignored.

PTS-MED promotes an organizational culture that supports human rights and seeks to avoid complicity in human rights abuses. We support the principles contained within the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Core Conventions on Labour Standards, the UK Modern Slavery Act and other similar laws and principles. We require our suppliers, contractors and other business partners to abide by similar standards in those areas where human rights issues are commonly implicated, such as working hours and conditions, discrimination and equality, child labour, fair wages, compulsory or forced labour and modern slavery.

Keep in mind

- We conduct due diligence to ensure our suppliers and business partners share our commitment to human rights and do not knowingly work with any supplier or business partner who engages in forced labour, modern slavery, human trafficking or the exploitation of or discrimination against anyone, including children and vulnerable groups.
- We respect rights related to freedom of association, collective representation, fair compensation, equal treatment, and safe and healthy workplaces.
- We are involved in multilateral efforts to support human rights through organizations such as the UN Global Compact and the Global Business Initiative on Human Rights, and in a wide range of activities to promote corporate respect of human rights.

Your role

- When visiting work sites, you should immediately report suspicious work practices, such as the employment of child labour workers or unsafe or unhealthy work places, to the Legal & Integrity team or the Corporate Responsibility team.
- Before establishing a relationship with a supplier or business partner, carry out suitable due diligence to ensure that the business partner is not currently involved in human rights violations, has not been involved in such violations in the past, and is committed to comparable standards as PTS-MED.
- Consider what impact an PTS-MED project might have on human rights in the region where it is to be executed. Discuss these impacts with your project management.
- Monitor the human rights practices of business partners on a regular basis. Include human rights in the continuous dialogue with your business partner.
- Be particularly sensitive to human rights when doing business in countries where the rule of law is weak or where government is not consistent with transparent processes.

Human rights

“What’s equal at any level?”

We respect rights related to freedom of association, collective representation, fair compensation, equal treatment, and safe and healthy workplaces.

We compete for business strictly on its merits. We do not offer or give anything of value to any private person, governmental official, or charitable or political organization for any unlawful, corrupt or improper purpose or for facilitating a routine government service or action. Likewise, we do not authorize or condone third parties, such as suppliers or channel partners, to do so on our behalf. We only enter business relationships with reputable third parties that share our ethical standards.

Keep in mind

- Bribery, corruption or improper payments can take many forms, including gifts, entertainment or hospitality, payments made through third parties or business partners, or donations to organizations affiliated with government officials or customers.
- Gifts, entertainment and hospitality can be offered only in accordance with PTS-MED's Corporate Regulations, consistent with the customer's internal policies and local law. Business gratuities may be perceived by the customer as a request to be treated favourably, especially if offered during an active tender. Gifts of cash or cash equivalents are strictly prohibited.
- Follow PTS-MED's Corporate Regulations for engaging and monitoring third parties that assist in marketing and sales activities or represent the PTS-MED brand.
- Employees of state-owned enterprises are government officials under our internal policies and under anti-bribery laws.
- Offering, authorizing or making an improper payment violates PTS-MED's Corporate Regulations, and may additionally expose you and the company to criminal prosecution and severe reputational harm.

Your role

- Watch out for and report immediately to the Legal & Integrity team any red flags that might appear to suggest an improper payment or business relationship, such as:
 - engagement of third parties who do not appear to add legitimate business value or are not qualified under PTS-MED's process;
 - unreasonable sales commissions, fees or distributor discounts ;
 - sales or transactional documents in which the services are vague or include unclear descriptions on invoices, or any request to inaccurately document a transaction; or, suggestions that a third party has political or undue influence on a customer's decision-making.
- Be alert to requests for donations to charities or organizations that might be affiliated with a customer or government official – follow PTS-MED's Corporate Regulation on political and charitable contributions.
- Turn down any request from a government official for a "grease" or "facilitation" payment a payment to that official as a condition for obtaining routine government services or benefits to which everyone is normally entitled. Report the request to the Legal & Integrity team.
- You are responsible for knowing and following the laws in the countries where you do business, check first with the Legal & Integrity team if you have any uncertainty.

Improper payments

“What payments are never due?”

Bribery, corruption or improper payments can take many forms, including gifts, entertainment or hospitality, payments made through third parties or business partners, or donations to organizations affiliated with government officials or customers.



We use information technology to advance the business interests of PTS-MED and our customers. We recognize that the use of information technology and associated systems such as email, software, networks, applications, internet and social media might all be subject to cyberattacks and other similar internal and external threats. We use our information technology responsibly, only for legitimate business purposes, consistent with PTS-MED's interests and rights, and in accordance with PTS-MED's rules and guidance regarding our information technology systems.

Keep in mind

- Social media must be used responsibly. Inappropriate communication or unauthorized sharing of information (e.g. images, comments, links or other data) could cause legal or reputational damage to you, your colleagues, PTS-MED, our customers, or others.
- Limited personal use of PTS-MED's information technology assets is permissible in accordance with applicable policies, provided such use is not in conflict with PTS-MED's interests or your job responsibilities.
- Cyberattacks typically aim at stealing data or making systems unusable and can have many victims, including customers or employees. Compromised systems can severely interfere with our information technology and operational technology systems.
- Portable storage devices, such as USB sticks, may contain malicious software and pose a risk to our systems. They should only be used with the greatest care and to the extent authorized.
- Information produced and stored on PTS-MED's information systems is a company asset. PTS-MED reserves the right to monitor the use of its information systems and to access, retrieve and disclose all such information except where limited by law or agreement.

Your role

- Never download, access or install software that you are not authorized or licensed to use or download on PTS-MED information systems. Never download or store PTS-MED information on personal or non-PTS-MED equipment or networks. Only store appropriate content on your PTS-MED-issued mobile phone, computer or other electronic devices.
- Protect your passwords. Do not write them down. Do not share them with others, including the Service Desk and support staff.
- Use PTS-MED accounts, not personal accounts, for business communication and storing PTS-MED data.
- If you become aware of a possible cyberattack or other malicious behaviour on PTS-MED's systems or assets, you must immediately inform the Service Desk.
- Act with caution with emails from unknown sources. Do not open suspicious attachments or links as they may put PTS-MED's information systems at risk. Report such emails through the specific means provided in the email system or to the Service Desk.
- Do not post inappropriate content on the internet or into any communication when using PTS-MED's information systems. Do not post pictures of colleagues or their computer screens on the internet that could reveal PTS-MED intellectual property, personal data or confidential information.

Information and technology security

“Are we under attack?”

Emails and other forms of electronic and instant communication might be regarded as statements issued by PTS-MED and should be written with care and attention. Failure to do so may bring PTS-MED into disrepute or put PTS-MED at a disadvantage in a commercial relationship or claim.

We recognize that the use of information technology and associated systems such as email, software, networks, applications, internet and social media might all be subject to cyberattacks and other similar internal and external threats.



We do not use material non-public information about PTS-MED or any other company for personal financial gain or advantage. Such information may include projections of future earnings or losses, pricing, proposals, changes in personnel, business acquisitions or divestitures, announced awards to vendors, unpublished information about new products or services or any other non-public information that, if disclosed, might influence a person's decision to buy, sell or hold a company's securities. We also do not communicate such information to anyone who is not entitled to be aware of it.

Keep in mind

- You might routinely come into possession of non-public information (some of which may be material) about PTS-MED or other companies, particularly those with whom PTS-MED does business, e.g., customers and suppliers. Even if PTS-MED is not traded in any stock exchanges, trading securities such as shares or bonds or options while possessing material non-public information is both unethical and illegal. Laws and agreements with stock exchanges prohibit anyone with material non-public information from using that knowledge in the trading of securities or from disclosing that information to others.
- It is not permitted to share material non-public information with PTS-MED colleagues unless they are on the approved list of individuals who are aware of that information.
- It is against the law to provide "tips" or share material non-public information with other people, including family members or friends.

Your role

- Be aware of PTS-MED's strict routines and guidelines for the handling of non-public information, especially if it is material.
- If you are working on the acquisition of another company, the divestiture of an PTS-MED company or the development of a joint venture, you will be required to sign a confidentiality agreement and must not trade securities based upon material non-public information you learn in the process.
- If you are unsure whether you have material non-public information, contact the Legal & Integrity team to discuss your situation.
- If you believe there is a requirement to disclose material non-public information, obtain approval from and coordinate with the Legal & Integrity team.

Inside information

"When don't we tip?"

It is against the law to provide "tips" or share material non-public information with other people, including family members or friends.



We take great pride in our spirit of innovation. PTS-MED has created an immensely valuable brand and continuously adds to its portfolio of intellectual property that is incorporated into patents, copyrights, trademarks, service marks, trade secrets, design rights, and other proprietary rights. We also possess vast amounts of know-how and other confidential information that give us a competitive edge in the marketplace. We vigorously protect our intellectual property and confidential information, and follow our internal policies on the proper use, safekeeping, marking and handling of such property and information. We respect the intellectual property and confidential information of others and expect the same from others in return.

Keep in mind

- Promptly disclose, prior to dissemination to others, ideas, inventions or developments to PTS-MED's intellectual property counsel so that appropriate legal protections may be developed.
- It is likely that you handle PTS-MED confidential or trade secret information every day safeguard its contents from unauthorized disclosure to third parties, avoid discussions in public places, and use filter screens on laptops when working externally.
- Confidential information needs to be appropriately labelled and classified, and access should be limited to only those who have a specific need to know. Remember that an outside party must sign a proper non-disclosure agreement before disclosure of any confidential information.
- When handling intellectual property, you need to ask: who owns this, am I authorized to use it, may I share it with others, and is the user's license or access rights still valid?
- Inappropriate use of others' intellectual property may expose PTS-MED and you to possible criminal and civil fines and penalties.
- Your obligations regarding the confidentiality of PTS-MED's proprietary information remain in place even after you have left PTS-MED.

Your role

- Use PTS-MED's confidential information, and the authorized confidential information of others, for business purposes only, and disclose it only to those who are authorized and have a need to know.
- Seek advice from PTS-MED's intellectual property counsel before you solicit, negotiate, accept or use intellectual property not owned or managed by PTS-MED and before letting a non-PTS-MED entity use or have access to any of PTS-MED's confidential information or intellectual property.
- Involve PTS-MED's intellectual property counsel before dealing with any legal intellectual property matter, agreements concerning intellectual property rights (such as third party licenses for instance), or another party's possible use of PTS-MED's intellectual property.
- Comply strictly with intellectual property licenses, obligations and term requirements, including third-party offerings, as in the case of software or images. Ensure PTS-MED complies with the obligations in such licenses, whether for a limited use or for commercialization.
- Seek legal review from PTS-MED's intellectual property counsel before externally publishing technical or company information that may contain intellectual property rights of PTS-MED.

Intellectual property and confidential information

“Can you keep a secret?”

We vigorously protect our intellectual property and confidential information, and follow our internal policies on the proper use, safekeeping, marking and handling of such property and information.



We acknowledge the importance of personal data protection and believe that the principles behind data protection strengthen individual rights. We collect, use, store, handle, transfer and disclose personal data in accordance with applicable laws and expect our suppliers and business partners to do the same. PTS-MED's global standards for safeguarding personal data ensures that PTS-MED provides a high level of protection regardless of where the data is collected and processed.

Keep in mind

- Personal data means any information relating to an identified or identifiable natural person. This may include, for example, a person's home or office address, email address, phone number, photo, birthdate, banking or payroll information, IP address, mobile device ID, government-issued identification information and other similar information of that person.
- PTS-MED collects, uses, stores, handles, transfers and discloses personal data in accordance with applicable laws.
- Certain categories of personal data must be treated with greater care, including, for example, race, ethnicity, political affiliations, religion, membership in a trade union, physical or mental health data, sexual orientation, criminal records and genetic and biometric data.
- Email and internet communications made through PTS-MED workplaces, networks, devices and providers may be treated as PTS-MED business information and so may be accessed, retrieved, monitored and disclosed by PTS-MED, subject to applicable legislation and contractual agreements.

Your role

- Only use personal data consistent with the business purpose for which it was collected and for only as long as necessary. Use the minimum personal data you need for your purpose; do not collect or use data that is not necessary or beyond document retention limits.
- If you transfer personal data, be aware of applicable local regulations. Be careful not to transfer personal data between countries without first understanding the data privacy standards in those countries.
- When collecting and using personal data, be careful to safeguard it against inadvertent disclosure, for example, by leaving data viewable in open spaces, electronic collaboration sites, at the printer, or in or on unsecured computers, devices, desks or cabinets.
- Report immediately security incidents involving personal data or any perceived weakness in PTS-MED's privacy safeguards to the Service Desk.
- Be familiar and comply with the relevant PTS-MED privacy, security and data protection policies, including PTS-MED's Corporate Regulation on data privacy.

Privacy and personal data

“When is not sharing, caring?”

PTS-MED collects, uses, stores, handles, transfers and discloses personal data in accordance with applicable laws.

Raising integrity concerns

How to raise a concern

Our business and our success are built on the principles of integrity in our Code of Conduct. We ask you to report promptly any suspected or potential violation to the Code so that we can investigate and, if necessary, take appropriate action to address potential issues before they might cause harm to employees, the company or to our reputation. We all have a responsibility on behalf of our colleagues, our stakeholders and our investors to ensure that potential violations of the Code are addressed thoroughly and promptly. We provide multiple ways for you to report confidentially potential violations of the Code of Conduct. In addition to the methods provided below, you may speak with your line manager, your HR manager, a member of the Legal & Integrity team, the CEO or the Board of Directors.

You can raise a concern anonymously. If you choose to remain anonymous, we would ask that you provide sufficient detail and factual information so that we can effectively follow up on your concern.

If you become aware of possible violations of the Code, laws or regulations you can raise your concerns by email at integrity@PTS-MED.com.

PTS-MED's commitment against retaliation

PTS-MED desires to maintain a culture in which employees and contractors feel free to raise concerns in good faith about potential violations of the Code of Conduct without fear of retaliation or other adverse employment action for doing so. Leaders are responsible for establishing the right integrity culture and tone in their organizations.

Any employee who retaliates against another employee or contractor for raising an integrity concern or cooperating in an integrity investigation will be subject to discipline, up to and including termination of employment.

PTS-MED will not condone or tolerate any adverse employment action taken against an employee who raises an integrity concern.

Leaders' duties when an employee raises an integrity concern

Employees will often raise integrity concerns directly with their managers. Handling such concerns with appropriate care and sensitivity is one of the principal responsibilities of leaders under our Code of Conduct. If an employee comes to you with an integrity concern, your responsibility is to pay careful attention, take notes as appropriate, ask any necessary clarifying questions and at the end to thank the employee for coming forward to raise the concern. You should not express a point of view or opinion as to the truth or merits of the employee's concern even where you personally believe the concern may be unfounded. You should let the employee know that you will promptly forward the concern and the information the employee provided you to the Legal & Integrity team for appropriate follow-up. Apart from forwarding the information to the Legal & Integrity team for follow up, you should treat the identity of the employee and the information provided with strict confidentiality. This means that you should not discuss the matter with anyone except the Legal & Integrity team – neither with your manager nor other employees. In addition, you should not take any adverse employment action against the employee for raising the concern, or against anyone else who may participate in an investigation relating to the concern. Your professionalism and sensitivity to these matters contribute directly and constructively to creating a culture of integrity where all employees feel comfortable to raise compliance concerns.

What happens when you raise a concern?

PTS-MED takes each concern seriously. The Legal & Integrity team will acknowledge receipt of your concern and review it carefully so that the appropriate follow-up action can be taken promptly. Your concern will be assigned to one of the PTS-MED investigators for further assessment and review. The investigator may interview employees and third parties who might be knowledgeable about the concern and review documents that relate to the concern. All PTS-MED employees and contractors have an obligation to fully cooperate and provide complete and truthful information to an investigator who is following up on an integrity concern.

The investigator will take reasonable steps to maintain the confidentiality of your concern, although it is possible that the questions asked or the information requested during the investigation process will reveal some aspects of the concern to a limited number of people who participated in the investigation.

If appropriate, the company will take interim corrective actions during the pendency of the investigation. Once the investigation is complete, and if the concern is substantiated, the case may be reported to an internal disciplinary committee that will decide whether further corrective or disciplinary actions are appropriate.

Corrective action and discipline

An organizational culture that encourages the reporting of concerns in an atmosphere free of a fear of retaliation significantly adds to PTS-MED's competitive edge by enabling the opportunity to address potential issues or in effective processes and controls early, before they become larger and less manageable. In cases where the review of the concern has identified areas of process or controls improvement, the respective business will be assigned the responsibility to implement the necessary and systemic corrective actions to prevent a recurrence. In other cases, it may be appropriate to discipline an individual employee which, subject to local law, may include termination of employment. The level of discipline will depend on several factors, including, but not limited to the following:

- the level and seniority of the employee involved;
- whether the employee acted deliberately;
- whether the employee violated the law;
- whether the employee cooperated fully with the investigation and provided complete and truthful information;
- whether the employee acted dishonestly, fraudulently, or for personal gain;
- whether the employee created the right culture of integrity in his or her organization;
- whether the employee's actions involved a repeat or systemic violation; and,
- whether the employee took measures to conceal the violation.

Your responsibilities under PTS-MED's Code of Conduct

“What do we do now?”

PTS-MED's technology, products and services make a major contribution to businesses and communities around the world. However, it is not merely what we do, but how we do it, which sets us apart from our competitors, strengthens our credibility and trust among our customers and stakeholders, and ensures our continued growth and success as an enterprise. The most critical element of how we work is integrity. Every employee at PTS-MED is expected to read and understand PTS-MED's Code of Conduct. Additionally, all employees must know how and where to report an integrity concern, report promptly all suspected violations of the Code, not retaliate against anyone for participating in an integrity investigation or for raising a good faith integrity concern, be honest and fully cooperative when asked to participate in an integrity investigation, be aware of the risks that exist in their organization, and complete in a timely fashion the necessary integrity training.

The Code imposes a high standard of ethical business conduct for all PTS-MED employees. Leaders in PTS-MED, however, have special responsibilities and obligations under the Code of Conduct, and these cannot be delegated to others. This list identifies and clarifies some of the most important responsibilities of leaders under the Code of Conduct.

The most critical element of how we work is integrity.

Leaders' responsibilities under the Code of Conduct.

- Provide integrity oversight and be engaged in the governance of your business.
- Know, anticipate and monitor the specific integrity and compliance risks that confront your business or function and ensure that you take appropriate actions to mitigate those risks.
- Create an atmosphere and culture in your organization that encourages, promotes and rewards integrity and diversity.
- Ensure that employees in your organization understand why it is important and beneficial to promptly report integrity concerns and that they feel comfortable doing so without fear of retaliation.
- Ensure that your employees are alert to and properly trained on the integrity and compliance risks that confront or are present in your business operations.
- Be a visible, accountable and consistent role model for integrity so that your employees know that you will support their ethical business conduct when it matters.
- Communicate with your team regularly on matters of integrity so that they feel comfortable discussing integrity and ethical issues with you.
- Hire and promote only those employees who have a demonstrated record of high integrity and ethical behaviour.
- Know how to manage confidentially and with appropriate urgency an integrity concern that an employee might raise with you directly, including reporting such a concern to the Legal & Integrity team.

Get in touch

We'd love to hear from you

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Thank You

For your attention

