

Global Code of Conduct

Dear Colleagues,

At Evident, we all must demonstrate our collective commitment to integrity and transparency, consistently choosing the path of ethical conduct. Our Code of Conduct includes our shared values, principles, and expectations to every member of our organization, from the senior leadership team to each valued individual contributor. In certain situations, you may need guidance in making the right decisions and knowing where to find necessary direction and information.

This is precisely where our Code of Conduct plays a pivotal role. It's not just a set of rules; rather, it's a promise by each of us to adhere to the highest standards, a promise to our fellow team members, business partners, and, above all, to our customers. The choices you make every day impact us all.

As your CEO, I expect each of you to uphold the principles in our Code, demonstrating unwavering integrity and transparency. I take immense pride in being part of this global company and rely on you to serve our customers with unparalleled ethical standards.

**Chief Executive Officer
William Wesley Pringle**



Dear Colleagues,

Our Code of Conduct serves as a compass for our ethical behavior in every decision and action we undertake. We must always follow our Code's standards and voice any concerns when those standards aren't followed. In addition to reaching out to your supervisor, manager, Human Resources, or the Compliance and Legal Departments, our Integrity Helpline is readily available to all of you as a confidential resource for addressing any issues anonymously. Reporting concerns is instrumental in upholding the highest ethical standards within our organization. It's vital to note that, here at Evident, we strictly enforce a non-retaliation policy for those making good faith reports of concerns.

Building trust among all stakeholders, including Evident members and customers, is contingent upon each of us consistently acting with unwavering integrity. It's essential to recognize that every individual contributes significantly to upholding a secure and honest environment at Evident. Let's actively apply our Code to our daily activities, fostering a better workplace and strengthening the foundation of trust we share.

**President and Chief Operating Officer
Hiroyuki Yoshimoto**



Table of Contents

5	Chapter 1 Introduction
6	Why Do We Have a Code?
6	Who Must Follow the Code?
6	How Should I Use the Code?
6	What Happens If Someone Violates the Code?
7	Chapter 2 We Create Quality Products and Services
8	Product Safety, Quality, and Security
8	Delivering Innovative Value
9	Chapter 3 We Conduct Business Lawfully and Ethically
10	Bribery and Corruption
11	Gifts, Meals, and Entertainment
12	Conflicts of Interest
13	Fair Competition and Business Intelligence
14	International Trade
14	Financial Integrity and Fraud
16	Managing Business Partners and Other Third Parties
17	Promoting Our Products

- 18** **Chapter 4**
We Provide a Safe and Respectful Workplace
- 19 Respectful Behavior
- 19 Safe and Healthy Workplace
- 20** **Chapter 5**
We Protect Company Assets and Information
- 21 Information Security
- 21 Personal Data
- 22 Insider Trading
- 23 Careful Communication and Record Management
- 24** **Chapter 6**
We Are a Good Corporate Citizen
- 25 Social Responsibility
- 25 Environment
- 26 Human Rights and Fair Labor Practices
- 27** **Chapter 7**
We Recognize and Respond to Incorrect Behavior
- 28 We Are Open When Dealing with Mistakes
- 28 Act to Create Trust

Chapter 1

Introduction

Why Do We Have a Code?

As our work environment becomes increasingly global and competitive, our Code reminds us that integrity is at the core of our business. Through our work and dedication, each of us contributes to Evident's positive reputation in society and in the industries we serve. This can only happen if users trust us and our products. We have to earn and renew this trust every day.

Who Must Follow the Code?

We are all called upon to take responsibility, to show integrity, and to do the right thing—the Code applies equally to all of us. We also expect our business partners to reflect a commitment to integrity consistent with our standards. Only by combining our success in business with a responsible approach can we meet our objectives.

How Should I Use the Code?

The Evident Global Code provides guidance on what behavior is appropriate as well as what is right and responsible for our company. It reflects our core values, internal policies, voluntary commitments and principles, and national and international laws. The Code principles should become a natural part of our work and our actions. We will only remain successful as a company if we all adhere to these basic tenets. Evident also has certain regional codes or policies. We will follow the standards in the Global Code as well as any regional codes, policies, and procedures that apply to our work.

What Happens If Someone Violates the Code?

Not adhering to the principles in this Code can threaten our relationships with stakeholders and break trust with customers and the public. Violations of the Code may be addressed by additional education about the Code, or may lead to corrective action up to termination. Where a violation of the Global Code is also a violation of law, it may also lead to fines and claims for damages.

Chapter 2

We Create Quality Products and Services

Product Safety, Quality, and Security

Evident stands for high-quality products and services. Our quality management processes and procedures help us comply with international standards and continually improve our products, services, and processes. We follow applicable Evident quality policies and applicable procedures to continue to maintain and improve the effectiveness of our quality management system in full conformance with regulatory requirements. Our goal is to achieve outstanding customer satisfaction and device safety.

What We Do

- › Follow internal quality procedures, processes, and requirements to ensure the quality, safety, and efficacy of our products and services.
- › Comply with applicable laws and regulations, standards, and other relevant requirements. We completely and accurately report quality testing results and never falsify, change, or conceal a finding.
- › Report any adverse events or potential adverse events or product quality complaints immediately to our Quality Assurance department and others as required by local regulations.
- › Consider cybersecurity and privacy risk management throughout the product development lifecycle.
- › Identify product security vulnerabilities and communicate mitigation actions with stakeholders.

Delivering Innovative Value

At Evident, we look beyond the present to deliver future value to our customers and stakeholders.

What We Do

- › Stay aware of trends around the world and pursue business ideas in tune with customer needs and desires.
- › Strive to develop and provide safe, high-quality products and services that are meaningful from the customers' perspective.

Chapter 3

We Conduct Business Lawfully and Ethically

Bribery and Corruption

We strive to conduct business fairly and with a high level of integrity. We do not tolerate corruption or bribery in our company.

What We Do

- › Never offer, give, or accept bribes or payoffs—either directly or through a third party—or engage in behaviors that appear as such.
- › It is not acceptable to influence purchase decisions by awarding inappropriate or illegal benefits. Always follow the relevant laws and regulations as well as guidelines (e.g., value limits) when inviting customers to events, offering gifts and entertainment, making donations, loaning equipment, etc.
- › Avoid even small gifts if they are intended to influence the recipient to provide a service in return.
- › Understand that government officials must comply with high legal and moral standards, including some that prohibit gifts and other benefits.
- › Adhere to all national and local laws, regulations, and codes of conduct that apply to the professional groups concerned.
- › Regarding the relationship with business partners, record the nature and purpose of any cooperation as well as the performance and consideration, responsibility for costs and payments, and evidence of the services provided (e.g., activity reports, etc.).
- › Contact the Compliance or Legal departments for support and advice.

Gifts, Meals, and Entertainment

While exchanging items of modest value can help build business goodwill, we are thoughtful about gifts, meals, and entertainment, recognizing their ability to sway judgment.

What We Do

- › Follow all gift policies and limits, including local guidelines.
- › Never offer gifts, meals, or entertainment in an attempt to influence someone's business decisions.
- › If you invite business partners to business meals and events, make sure the costs are reasonable and the recipient did not request the invitation.
- › Never ask a business contact for a gift.
- › Never accept benefits or gifts that could influence—or even appear to influence—your own business decisions.
- › Only accept invitations to business meals and events if the financial value is appropriate and the invitations are made only occasionally, subject to applicable laws and regulations.
- › Be transparent and disclose the gifts and other invitations you receive to your supervisor.
- › Follow applicable Evident Global Rules and regional compliance policies. Specific and strict rules about meals and gifts apply to government officials and in healthcare and life science markets.

Conflicts of Interest

At work, we expect you to disclose any possible conflict between your private interests and Evident's interests. This includes if you work with friends or family or hold a financial interest in a company with which we do business. Clearly communicating any possible conflicts can help ensure that there is no actual or perceived influence on business decisions as a result of such collaboration.

What We Do

- › Recognize that employees owe a duty of loyalty to the company.
- › Watch for conflicts of interest, including situations where others may perceive a conflict.
- › Disclose any conflicts of interest that exist when you come to work at Evident or that emerge later.
- › Work with the company to address and resolve any conflicts. This might involve removing yourself from decision making related to the conflict.

The following situations can lead to conflicts of interest:

- › Financial interests and investments: For example, you or a relative has an ownership interest in an Evident supplier, competitor, service provider, or customer.
- › Family members and close personal relationships: For example, you hire, evaluate, or manage a family member, close friend, or romantic partner.
- › Outside involvements: For example, you take a political or charitable role outside of work that interferes with the company's best interest or your job duties.

If you think you have a conflict, disclose it by talking to your manager, Compliance, or Human Resources. Many conflicts can be addressed and resolved without serious issue.

Occasionally employees establish romantic relationships at the workplace. We respect your privacy, and there is no reason to hide a personal relationship within the company.

However, contact either the HR department or your manager if you notice or suspect a conflict at work due to your relationship. Romantic relationships between managers and their subordinates call for particular sensitivity and might be prohibited under regional policies.

Fair Competition and Business Intelligence

Our business relations are based on free and fair competition. We do not apply unfair business practices, and we adhere to all laws concerning the restriction of competition. Violations of competition or antitrust laws can lead to high fines and penalties for the company and may also apply to employees.

What We Do

- › Be extremely careful when communicating with competitors—especially during informal discussions.
- › Openly identify yourself as an Evident employee.
- › Never discuss confidential topics with competitors, such as pricing, business areas, sales volumes, or the type and quantity of products sold or produced.
- › Never talk to competitors about dividing markets or suggest ruling out business with certain customers.
- › Never fix or discuss fixing sales prices with competitors.
- › Compete fairly and avoid conduct that constitutes or may appear to be manipulation of a tender or bidding process.

We do not make agreements with competitors on topics like:

- › Prices
- › Coordinating bids
- › Terms or conditions of sale
- › Research and development plans
- › Market division or customer allocation
- › Production volumes

International Trade

We are required to adhere to import and export laws governing cross-border trade and to play an active role in control measures. This is a complex and technical area—if you are involved in international trade, work closely with Evident Trade Compliance management.

What We Do

- › Recognize controlled products and obtain any required import and export licenses.
- › Never export to restricted parties, countries, or entities.
- › Provide accurate and truthful information to customs and regulatory agencies.
- › Comply with applicable trade laws and regulations.

Financial Integrity and Fraud

At Evident, we practice transparency at every level and make it a priority to prevent and detect fraud. Providing honest and accurate information related to our financial and company performance is essential to gain trust from our stakeholders and continue business. We show integrity with our reporting, following all required accounting standards.

What We Do

- › Report and record all financial data, including revenue and expense transactions, honestly, accurately, completely, and in the proper accounting period.
- › Comply with applicable tax laws and regulations.
- › Never make false reports or expense claims. Never intentionally record incorrect information or manipulate accounting information or financial statements to secure profits, achieve sales budgets, fulfill budgeted expenses, or for any other reason.
- › Follow all reporting and disclosure requirements and cooperate with any internal or external auditors.

Money laundering is a serious global problem and a financial crime that touches many businesses. Remain alert to unusual behavior related to financial transactions, such as:

- › Evasiveness or a reluctance to provide information.
- › Incomplete or inconsistent information, such as documents that can't be verified, multiple tax identification numbers or attempts to shield the identity of the people involved.
- › Requests for unusual money transfers or transactions.
- › Negative news coverage of an involved individual or company.

Managing Business Partners and Other Third Parties

We are responsible for the entire lifecycle of our products—from product design, material sourcing, and production to environmental disposal. Any illegal or unethical actions by a business partner can expose us to liability and reputation damage. We carefully evaluate and screen potential third parties and business partners before working with them, and we reserve the right to terminate contracts with companies and individuals whose actions put us at risk.

What We Do

- › Only work with qualified contractors, business partners, and other third parties.
- › Screen third parties and potential business partners before engaging in business relationships and re-evaluate existing relationships regularly in accordance with Evident policies.
- › Require that those who we work with will abide by our requirements related to corruption, bribery, and other illegal or inappropriate activities.
- › Monitor, and, when possible, secure and exercise the right to audit the contractors, business partners, and other third parties we work with regularly and watch for signs of unethical or illegal actions.

We expect our business partners, suppliers, distributors, and third parties who act on our behalf to share our values and uphold the standards set out in the Code.

Promoting Our Products

Our customers and other stakeholders trust us to provide honest and accurate information about our products. We promote our products only in a clear, fair, and understandable way and consistent with regulatory requirements.

What We Do

- › Communicate all product information truthfully, clearly disclosing risks and benefits.
- › Never misstate or omit safety information.
- › Use only promotional material that the company has reviewed and approved.
- › Follow local regulatory requirements when promoting products.

Interactions with healthcare professionals:

All our scientific and promotional activities with healthcare professionals and organizations are intended to ensure the effective use of our products and enhance patient care.

Any information provided should be useful, accurate, supported by scientific evidence, and presented honestly.

Chapter 4

We Provide a Safe and Respectful Workplace

Respectful Behavior

Dignity and mutual respect are at the heart of our interactions with each other, business partners, and anyone we encounter in a business setting. We do not allow harassing behavior or discrimination based on personal characteristics like gender, age, nationality, ethnicity, skin color, political views, sexual orientation, religious beliefs, social background, or disability. We want a healthy and encouraging work environment. Disrespectful behavior can lead to disciplinary action up to and including termination.

What We Do

- › Treat colleagues, customers, and business partners with courtesy, dignity, and respect.
- › Show appreciation for diversity of people, views, and work styles.
- › Never discriminate against job candidates or employees.
- › Avoid speaking generally about or stereotyping groups, including specific racial, gender, or religious groups.
- › Never harass others and speak up if you see harassment take place.

Safe and Healthy Workplace

Occupational health and safety is a major priority. We take proactive steps to prevent accidents and occupational illnesses at work. We want our employees to work in an ergonomic and employee-friendly environment. At Evident, we promote good health and wellness.

What We Do

- › Use good judgment and act in a manner that is safe for you and others.
- › Report safety concerns and work-related injuries or illnesses.
- › Never joke about violence and report any violent threats or warning signs from others.
- › Comply with applicable health and safety regulations.

Chapter 5

We Protect Company Assets and Information

Information Security

Evident holds a great deal of valuable information in our offices and on our company networks and servers, some of which is confidential or sensitive. We all share a responsibility to help protect this information and avoid taking actions that could lead to the information being lost, stolen, or accidentally disclosed and to adopt appropriate information security management systems.

What We Do

- › Understand what is confidential information that needs to be protected.
- › Manage and protect information assets (customer and internal) in accordance with Evident policy, whether it is in electronic or physical form.
- › Take appropriate measures to protect our computers, devices, and company networks.
- › Use strong passwords and do not share passwords.
- › Store confidential information on authorized company networks and systems.
- › Let your manager know if you have access to confidential information that is not necessary for your job.

Personal Data

Safeguarding personal data is fundamental to Evident's commitment to customers, external business partners, and employees. We show respect for people's privacy rights by safeguarding personal data about individuals and protecting it from unauthorized or unlawful disclosure or misuse. In addition, we observe all company guidelines and applicable privacy laws when we collect, store, use, and share personal information about individuals.

What We Do

- › Never access personal data stored on our systems, unless your job requires it and the use is in line with the original purpose for which the information was collected.
- › Only process personal data that is relevant, and limited to what is necessary in relation to the purposes it was collected for.
- › Periodically review the information you hold and discard any personal data you have that you no longer need.

Insider Trading

It's possible that, in the course of our jobs, we may learn information about Evident or other companies that is not known to the general public. When this happens, we must avoid trading the stock or other securities of those companies, or tipping others to trade those stocks or securities.

What We Do

- › Recognize when you are working with inside information.
- › If you have inside information, do not trade company shares or other financial instruments until the information is public.
- › Never tell anyone else to trade on the basis of inside information.

**Inside information is any information that might cause a reasonable investor to buy or sell stock or other securities.
For instance:**

- › Unreleased financial results
- › Plans to acquire another company
- › Planned announcements of new products
- › Discussions about making a substantial investment in another company
- › A decision to outsource a large volume of business
- › Plans to cancel a large supplier's contract

Careful Communication and Record Management

Written communication be it on paper, in electronic documents, in e-mails, or on social media, requires special attention. Statements can be taken out of context and express something different from what the author originally intended. Always communicate professionally, recognizing that it's possible for any communication to be retrieved and read in the future, without the benefit of your intentions or the original context.

What We Do

- › Be open and honest—make sure that your communication is always fact-based, objective, transparent, professional, and honest.
- › Always retain documents as required by company records retention schedules. Never destroy records that are, or could be, relevant to a potential or impending official investigation or court case.
- › Never communicate with the media or respond to investor inquiries on the company's behalf unless you are expressly authorized.

Chapter 6

We Are a Good Corporate Citizen

Social Responsibility

Evident regards itself as a citizen in the communities where employees live and work. We will always respect the culture and practices of the countries and regions where the company engages in business. Our purpose is to make continued contributions to society through our products and our activities in the community.

What We Do

- › Remain mindful of the impact of our decisions on stakeholders and society.
- › Strive to develop mutual understanding with people living in the countries and regions where we conduct business.
- › Support community projects that reflect our business by donating money or materials to charitable organizations and offering grants to support education, training, and professional development.
- › Draw on our own skills and expertise to volunteer.

Environment

It's our responsibility to preserve the global environment and coexist with nature to realize a sustainable society. We have taken a responsible and conservative approach to using natural resources, employ sustainable technologies whenever possible at our production sites, and develop environmentally friendly products for our customers. We take action to improve our carbon footprint year after year, with the aim of becoming more carbon-neutral in the long term.

What We Do

- › Follow applicable environmental laws and regulations, as well as stringent internal standards.
- › Whenever possible, avoid use of materials or methods that create environmental or health risks when suitable alternatives are available.
- › Save energy and resources, promote recycling, use renewable sources where possible, and optimize company processes to be more efficient.
- › Continuously improve our environmental activities, following our Environmental Management System.

Human Rights and Fair Labor Practices

In all corporate activities, Evident will respect all internationally recognized human rights and will prohibit forced labor, child labor, and discrimination. We perform due diligence so that we can avoid using suppliers that offer unsafe products and services, violate applicable law, use child workers or forced labor, or subject employees to corporal punishment.

What We Do

- › Support basic human rights, respect labor laws, and do not use any form of forced, compulsory, or child labor.
- › Know the signs of human trafficking and forced labor and report any human rights abuse immediately.
- › Never work with or encourage, either directly or indirectly, any antisocial forces or organizations that threaten the order and safety of society.

Chapter 7

We Recognize and Respond to Incorrect Behavior

We Are Open When Dealing with Mistakes

Be transparent with the company and seek assistance if you make a mistake or witness the mistakes of others. Only by discussing problems can we find solutions and improve as a team. We encourage everyone to report illegal behavior by employees, managers, suppliers, and business partners, for example, in case of financial fraud or violations of competition law.

Act to Create Trust

We understand it is not always easy to raise concerns about possible misconduct, and we encourage you to come forward and report any concern to the Legal & Compliance Department, your manager, Human Resources, or to the Evident Integrity Helpline. By speaking up, you will help prevent damage to Evident and your colleagues.

- › Share your concerns. If you seek advice or identify incorrect behavior, you do not have to deal with the situation alone. Raising concerns can protect the company from damages.
- › Taking action to protect our values is always right and appreciated at Evident.
- › We do not tolerate discrimination or retaliation against individuals who report their concerns or take part in an investigation in good faith—even if insufficient evidence is found to confirm a legitimate concern.

Do you have a
Compliance
Concern?



› **REPORT IT TODAY!**

Integrity Helpline

Evident provides a reporting system that is available to all employees, business partners, and third parties who wish to report a concern. The Evident Integrity Helpline is managed by Convercent (OneTrust), a third-party company who is independent from Evident. This Integrity Helpline can be used at any time—24 hours a day, 7 days a week, and 365 days a year—and can be accessed online or over the phone. You may be able to remain anonymous when making a report, to the extent possible by local law. Your Integrity Helpline call or website inquiry cannot be traced.

EVIDENT