



CODE OF CONDUCT FOR THE BONESUPPORT GROUP

1	Introduction	2
2	Compliance with laws	2
3	Workplace	3
4	Whistleblowing system	3
5	Health & Safety	3
6	Conflict of interest	4
7	Research and development	4
8	Products and services	4
9	Product safety and quality	5
10	Advertisement and promotion	5
11	Interactions with Health Care Professionals (HCPs)	5
12	Interactions with government regulatory agencies.....	5
13	Procurement	5
14	Anti-bribery and anti-corruption	6
15	Competition and anti-trust	6
16	International Trade Controls.....	6
17	Political activities	7
18	Data Privacy	7
19	Company records, disclosures and securities transactions	7

1 Introduction

- 1.1 An important prerequisite for the long-term sustainable success of BONESUPPORT HOLDING AB (“Bonesupport”, “us” or “we”) is the trust of our shareholders, business relations and the market in general. To maintain this trust, we must ensure that our activities are conducted in an ethical manner. This code of conduct (the “Code of Conduct”) established by the board of directors of BONESUPPORT HOLDING AB describes the general ethical principles in our business and what behaviour that is expected of our Employees.
- 1.2 In this Code of Conduct, a reference to “us” or “we” includes, as applicable, a reference to our subsidiaries from time to time. This Code of Conduct applies to all of our and our subsidiaries’ directors, officers, employees, contractors and temporary staff (collectively referred to as “Employees”).
- 1.3 The purpose of this Code of Conduct is to assist our Employees in their daily work and business activities to promote the long-term positive development of our business. The Code of Conduct recognizes that compliance with law and relevant regulation is a fundamental duty and an essential part of the responsibility of each Employee.
- 1.4 This Code of Conduct describes the main principles which we consider to be responsible behaviour, but does not cover every possible specific situation that our Employees may find themselves in. Every Employee should always demonstrate sound judgment, honesty, diligence and respect in their work for us. More detailed guidance can be found in our other policies.
- 1.5 All Employees have an individual responsibility to know and follow the rules and guidelines in this Code of Conduct. If an Employee is unsure of how these guidelines should be interpreted, or if there is uncertainty if specific circumstances are contrary to the guidelines, this should always be discussed with immediate superiors.
- 1.6 Violations of this Code of Conduct may result in disciplinary action. We will not accept any discrimination or retaliation against Employees who in good faith report suspected violations.
- 1.7 We reserve the right to amend or replace this Code of Conduct without prior notice at any time.

2 Compliance with laws

Bonesupport and all our Employees must comply with applicable laws, regulations and directions imposed by the authorities in the performance of their duties for us. Employees may not contribute to any violations that might be committed by our business relationships or other stakeholders. Obeying domestic laws is the first obligation of business enterprises. In countries where domestic laws and regulations are in conflict with, or set different (lower) standards of protection than this Code of Conduct, we shall seek ways to abide by the principles that provide the highest protection to people and the environment.

3 Workplace

- 3.1 We are committed to creating a positive workplace, free from discrimination or harassment of any kind. We value the contributions of each individual and group and treat one another with respect, regardless of position, status or relationship. We do not tolerate any form of harassment and base all employment-related decisions, such as recruitment, hiring, remuneration, promotion and development opportunities on the job qualifications, merit and/or performance of the individual, without regard to for example gender, sexual orientation, age, ethnic or cultural belonging, religious beliefs, identity expression or other characteristics protected by applicable laws. Harassment, degrading behavior, discrimination, violence or threats against others will never be tolerated.
- 3.2 We are committed to complying with all applicable employment laws and regulations as well as the principles laid out in the United Nations Declaration of Human Rights. We are also respectful of our Employees' right to join and form independent trade unions and freedom of association.
- 3.3 Bonesupport is a drug-free workplace. This means that Employees must not be under the influence of alcohol or other drugs when working. Nor should alcohol be offered when in business with customers or HCPs (Health Care Professionals) as relates to business presentation, product training or other events, other than as part of permissible business specific dinners.

4 Whistleblowing system

- 4.1 We condemn and do not tolerate any corruption or other crimes within our operations and organisation. Therefore, as a mean of enabling identification and addressing misconduct, Bonesupport provides reporting channels where suspected irregularities can be reported in such a way that the reporting party feels safe, i.e. a so-called whistleblowing system. While the whistleblowing system is the referred way of reporting relevant misconduct, it is always possible to use our other day-to-day reporting channels such as speaking to one's own line manager, but sometimes this channel doesn't appear appropriate or sufficient.
- 4.2 Employees have access to information on internal channels containing guidance around e.g. in what situations the whistleblowing system can be used, what matters that can be reported, to whom one can report and how personal information is handled. A report submitted through the whistleblowing system is received by our external legal counsel.
- 4.3 An Employee who reports an issue in accordance with our Whistleblowing system will never experience disciplinary actions, retaliations or any negative reactions from us as a result therefrom.

5 Health & Safety

- 5.1 We always strive to provide a safe and secure work environment where no one is subject to unnecessary risk. Safety and health considerations should be integrated into everything we do. Employees are expected to identify and understand the risks associated with their work, manage risks responsibly, and only perform work for which adequate training has been provided.
- 5.2 Employees should promptly report all health and safety issues, including unsafe conditions, accidents, near misses and work-related injuries; and promptly report all security issues, including threatening or violent behaviour to their immediate superior.

6 Conflict of interest

- 6.1 A conflict of interest can occur when an Employee's private interest interferes with our business interests. Each Employee must always avoid any private interests influencing his or her ability to act in the interests of our business, or making it difficult to perform his or her work objectively and effectively.
- 6.2 All Employees must disclose any situations that reasonably would be expected to give rise to a conflict of interest.

7 Research and development

- 7.1 We are engaged in developing new and innovative treatments and medical products with the goal of contributing to improving the lives of patients and a better society as a whole. Clinical research and the conduct of clinical trials in humans to evaluate the safety and efficacy of products for the treatment and prevention of medical conditions are critical components of product development. We shall always apply high ethical standards in the conduct of our research and development activities, complying with applicable laws, regulations and industry codes, including the declaration from Helsinki governing research and development performance, and international standards of good practices, such as Good Laboratory Practices ("GLP") and Good Clinical Practices ("GCP").
- 7.2 We are fully committed to protecting the patients and volunteers who take part in clinical trials, ensuring that we uphold the highest ethical, scientific and clinical standards in all research initiatives and providing study results in a timely, objective, accurate and complete manner, also recognizing that there are important public health benefits in making study results available to patients, health care providers, and the general public. All data from clinical research is recorded, handled and stored in a way that is in accordance with applicable laws (including but not limited to applicable personal data regulations) and enables accurate reporting, interpretation and verification. Individuals participating in clinical trials should not be exposed to any unnecessary risks.

8 Products and services

- 8.1 We are committed to always provide truthful, non-misleading and accurate information about the approved uses of our products and we never offer or promise anything of value to influence purchasing decisions. Patients and Health Care Professionals (HCPs) have a right to decide the best course of care, based on truthful, fair, substantiated and scientifically rigorous claims.
- 8.2 Our Employees shall:
- (a) always give an accurate, non-misleading, balanced presentation of our product attributes, including relevant safety information;
 - (b) only promote products for uses that have been approved in a manner consistent with the country-specific approved labeling;
 - (c) never promise or provide anything of value to reward or encourage the use, purchase or recommendation of our products; and
 - (d) comply with applicable laws and regulations.

9 Product safety and quality

- 9.1 Patient safety is the highest priority for us. In research, development, manufacture, storage, distribution and post-marketing activities, we shall comply with all applicable laws and regulations related thereto, including reporting of safety information designed to ensure the safety and quality of medical products. We shall also always adhere to our internal policies and standard operating procedures designed to protect patient safety and to ensure quality of our products.
- 9.2 Products on the market will continue to be monitored for adverse events, new and unexpected safety signals and the regulatory agencies will be informed about these in accordance with applicable rules and regulations. Every Employee is responsible for reporting any safety or performance issues in clinical trials and our marketed products.

10 Advertisement and promotion

We are committed to complying with all applicable laws, regulations and industry codes governing promotional activities and advertising and will conduct these activities in an appropriate and ethical manner.

11 Interactions with Health Care Professionals (HCPs)

We are committed to applying, in all interactions with HCPs and organizations, the highest standards of integrity and honesty, and to follow applicable laws, regulations and industry codes. This e.g. includes that there must be legitimate needs for engaging services of HCPs or organizations and any payment for services. Payments may furthermore only be provided if there is a written agreement governing the applicable services and must not exceed reasonable market rate for such service.

12 Interactions with government regulatory agencies

We operate in a highly regulated industry. Governmental regulatory agencies routinely request information during audits, inquiries and investigations. All Employees shall deal honestly and professionally with such officials at all times.

13 Procurement

- 13.1 Our suppliers play an important role in our research, development and commercialization of our products. We will always choose our suppliers based on objective criteria, and with the expectation that our suppliers will act in a manner consistent with our own commitment to lawful, fair and ethical business practices.
- 13.2 Our Employees shall always:
- (a) select vendors and suppliers based on objective criteria, such as price, merit, quality, service, reliability, and reputation;
 - (b) make sure that vendors and suppliers comply with all legal requirements and local laws, and act in a manner consistent with our commitment to ethics and compliance as outlined in this Code of Conduct and other internal policies applicable;
 - (c) report to the management all allegations of improper business practices, bribery and corruption relating to vendors and suppliers;
 - (d) refuse to accept any cash, credit, services, payments, loans, personal discounts or other favors from a vendor or supplier; and

- (e) avoid conflicts of interest, inappropriate gifts and entertainment.

14 Anti-bribery and anti-corruption

- 14.1 Employees or third parties acting on our behalf may never make a payment or provide a benefit that is intended to improperly influence, or appears to influence, a business decision. This is always crucial, especially in the case of public officials, government employees, HCPs and organizations, patients and patient groups. Violations of anti-bribery and anti-corruption laws, including local laws are, in addition to being grounds for immediate dismissal and/or other legal actions, punishable by substantial fines and penalties, including imprisonment.
- 14.2 No Employee shall accept, offer or pay bribes or directly or indirectly accept gifts, hospitality, fringes or compensation in any form from a third party which may be unlawful or which could in any way affect his/her professional judgment in performing any duty or service for us or a third party. In relation to public procurement and governmental decision making, benefits should never be offered to public sector representatives, their associates, or any other party with the intent of influencing an award of a bid or any other decision.
- 14.3 All payments made to a government official or private individual, in accordance with the requirements of this Section 14, must be reported and appropriately recorded

15 Competition and anti-trust

- 15.1 We shall comply with all applicable competition and anti-trust laws. These laws prohibit agreements with competitors, suppliers and customers to fix prices or to otherwise restrain trade. Anti-trust and competition laws are vigorously enforced and can result in large financial penalties, as well as, in addition to being grounds for immediate dismissal and/or other legal actions, possible imprisonment for individuals, and must always be followed.
- 15.2 We do not engage, directly or indirectly, in activities that may be viewed as anti-competitive or unethical, or in any activity involving bid-rigging or boycott. Our Employees shall not engage in improper or prohibited discussions or activities or discussions or activities that could lead to the appearance of improper behavior, and should never discuss issues relating to pricing, sales, inventory, or marketing plans with competitors.

16 International Trade Controls

In doing international business, we are also committed to complying with laws, regulations, licensing requirements, boycotts, embargoes and other restrictions such as sanctions and export control regulations approved by recognized national and international authorities, including but not limited to the United Nations, Sweden, the European Union, the United Kingdom and the United States of America. We will always provide accurate and correct information about our products to customs authorities and other relevant authorities.

17 Political activities

- 17.1 We are neutral in matters of political parties and candidates. However, we support the right to engage in personal political activities, as long as these activities remain private, are lawful and ethical, and are conducted on personal time with personal resources.
- 17.2 Neither our name nor our assets should be used to promote political parties or candidates.

18 Data Privacy

- 18.1 We may, in the conduct of our business, collect and use personal information, including sensitive personal data. We are committed to protecting individuals from unauthorized use and disclosure of their personal information and providing individuals with transparency and choices regarding how their personal information is used.
- 18.2 We will always comply with applicable data privacy laws and related regulations regarding all processing of personal data, including but not limited to collection, use, retention and disclosure of personal data gathered or entrusted to us. Employees shall always respect the sensitivity regarding collected or entrusted personal data, and make sure such data is secure so that the integrity of such data is not risked and that such data is not wrongfully disclosed.

19 Company records, disclosures and securities transactions

- 19.1 Company records shall always comply with all applicable laws and regulations and our policies relevant to corporate accounting. We will record all transactions on the company books accurately and properly in accordance with generally accepted accounting principles. We will always maintain internal control systems to ensure that all transactions are accurately and properly recorded, and never make any false or artificial entries.
 - 19.2 All our communication shall be long term sustainable and in accordance with our trademark vision, business concept, strategies, goals and values. The communication shall be direct, open, objective, well-structured and well-planned, both in success and adversity. For further guidance, please refer to our Information policy and relevant SOPs.
 - 19.3 Insider trading is strictly prohibited and we will comply with all securities laws and regulations restricting insider trading of securities. For further guidance, please refer to our insider policy.
-