

Purpose

This code includes the guiding principles for ethical behavior to which we are committed, as a business organization. It includes the areas of employee rights, environment and corporate responsibility. The ethical principles that guide us, are based on our vision, mission and values, and apply to all employees, managers and board members.

- Our Mission at Elcam Medical A.C.A.L and its subsidiaries (“Elcam”) is to consistently deliver world class medical devices - safe, simple and reliable.
- We do so by partnering with customers and entrepreneurs to develop innovative, high quality and affordable solutions that advance the health and wellbeing of caregivers and patients all over the world.
- In accordance with our mission, we hold ourselves accountable for our environmental, social and governance performance, and thus adopted ESG (Environmental, Social, Governance) principles, which each of our plants, offices, subsidiaries and any related party follow, together with all applicable laws and relevant regulations in their countries as a minimum standard.
- Compliance for us is more than simply adhering to laws and legal requirements. We are committed to act ethically and with the highest standards of integrity and behavior both internally and externally, to the benefit of Elcam’s workers, clients, stakeholders and our long-lasting success

Elcam Medical’s four values are Consistency, Quality, Care & Growth



From patient care to caring for one another, Care is at the heart of everything we do. It is working as one team, regardless of where we are in the world. It is respect for all people and a celebration of a diverse workforce where everyone is treated fairly and honestly. It is caring for the society and the environment in which we live in- for our communities, our planet, and for future generations.



Quality means we are committed to excellence and professionalism in everything we do. We adhere to rigorous measures and processes so that our customers and partners can always rely on us to deliver the best quality solutions.



Consistency starts with knowing Elcam is built on solid ground, with financial and organizational stability that support our long-term goals. Everything we do is focused on the long term. We hire people for the long term, as well as build and nurture long term, stable relationships with our customers and partners. It means that we will consistently deliver on our promises, today and tomorrow.



Growth is always striving to do more and better. It means encouraging continuous improvement and learning for both personal and business growth. It means being bold and innovative in new products, services and solutions. It means focusing on our success and that of our shareholders, customers and partners so we can grow and prosper together.

Ethical Behavior & Compliance

- Elcam insists on integrity and etiquette in all aspects of our work and the work of our partners. We are committed to being a place where each employee feels valued and has a sense of belonging.
- Ethical behavior is embedded in our guidelines. Corruption and bribery, conflict of interest, fraud, money laundering, antitrust violations and anti-competitive practices are all completely prohibited.
- All reporting and communication with our shareholders, including investor relation information and financial reports, is rooted in the principles of transparency and integrity. We follow accurate accounting practices and prohibit the falsification of records.
- Information and cyber security are closely monitored to maintain confidentiality and privacy of our employees and all of our stakeholders, since business and customer information is critical to our business. Firm procedures and cyber security measures are in place to ensure that all confidential data is handled appropriately in regards to access, use, storage, transmission and disposal.
- Social media publications are monitored to ensure that they are responsible, ethical, and appropriate.
- We maintain fairness in business management. All aspects of our financial activities, including validity and reliability in company reports are being strictly maintained.
- We adhere to appropriate methods in the collection of any competitive market information and do not use cohesive or misrepresentation to gain information. We are dedicated to responsible promotion practices and sales methods. Direct sales communications have to be presented based on their legally approved product labels and accurate information.
- The Board of Directors, managers and employees must fulfill their roles impartially, preventing conflicts of interest between the employee's personal interests and the company. Relevant employees sign declarations of no-competition and no exploitation of the company's business opportunities, assets and status by the company's employees for personal purposes.
- Elcam will never abuse company power, and will never promote political power by any means.

Tel: 972-4-698-8120/1
Fax: 972-4-698-0777

www.elcam-medical.com
Baram 1386000, Israel | sales@elcam.co.il

Human Rights & Employee Health & Safety

- At Elcam we believe in respecting human rights and strive to ensure we treat all our employees and suppliers respectfully, fairly, and in adherence with all labor laws, regulations and ethical standards.
- Maintaining a healthy working environment where all our employees feel valued and supported is crucial to our success. Developing teamwork is important to a positive environment and collaboration and we make sure that it is maintained and improved on a regular basis. All employees, at all levels, give and receive feedback about different aspects of work. This feedback enables continuous improvement and is highly appreciated.
- Elcam promotes a safe and healthy work environment where risks are reduced to prevent employee injuries. We keep the highest standards of safety for our employees which is implemented through our safety procedures.
- Employee wellness is emphasized, and verbal or physical harassment, including sexual harassment, and intimidation are not tolerated. Human rights are respected and honored.
- We promote an inclusive and diverse workplace. We do not tolerate any form of discrimination based on race, ethnicity, color, religion, sex, gender identity and expression, national origin, age, disability, genetic information, sexual orientation, military, veteran or other protected status. All experiences and perspectives are respected and valued. We integrate employees with disabilities and promote a gender and minority-inclusive environment.
- We enrich the knowledge, training, career management, and work environment of our employees. We rely upon managers to support work-life balance and to serve as the direct contact person regarding any issue within their team.
- We make sure to follow all applicable wage and hour labor laws for every country in which we operate and uphold wage equality in the workplace. We annually review employees' wages in every country, to make sure we meet the average range at a minimum.
- Elcam maintains the highest standards for our customers' health & safety. For that purpose, the company's management prioritizes quality, ensuring the highest standards throughout the product lifecycle: methods, controls, design, manufacturing, packaging, labeling, storage, shipment and post-marketing surveillance activities. All of these help us improve our products and production processes and make sure that we act responsibly.
- Elcam Medical has a [Labor and Human Rights Policy](#), which details further information.

Tel: 972-4-698-8120/1
Fax: 972-4-698-0777

www.elcam-medical.com
Baram 1386000, Israel | sales@elcam.co.il

Responsible Supplier and Community Relations

- In accordance with social responsibility, Elcam maintains good citizenship in all of the communities in which we live and operate, and in society in general.
- We strive to act responsibly in all aspects of our local, national, and global communities, including
- in the business and environmental activities in which we participate.
- Maintaining a high level of social responsibility as a company also means using all our resources, including philanthropy and community investment, to address important social issues in our communities and especially creating perspective for future generations. Elcam's social activities are conducted with the intention of using our inner strengths to promote social growth in our surrounding communities, and recreational activities for our own employees and their families.
- We make sure to work with suppliers, subcontractors and service providers who ensure the highest standards of conduct.
- We have a strict policy regarding all aspects of giving and receiving gifts and favors.
- We prioritize sustainable procurement- environmental issues, ethics, labor practices and human rights.
- We do not permit child labor or any forced labor including for our suppliers, subcontractors and service providers.
- We ask our partners to implement and comply with our code, as written in our [Code of Conduct for Suppliers](#).

Environmental Responsibility

- We aim to reduce our environmental footprint in order to leave a healthier planet for future generations. Elcam Medical's [environmental policy](#) outlines our practices regarding energy consumption, renewable energy, improvement of energy efficiency, water management, hazardous materials and waste management, reduction of environmental impacts and biodiversity, because we understand there is only one planet.
- Elcam Medical's employees are committed to protecting the environment and conserving resources. Our activities in this field include recycling of plastic bags, cartons and paper, reuse of our raw material (not for Elcam's products or production), and collection of metal waste. We are also working to increase awareness for paperless office and all-around employee education.
- Energy conservation is part of our commitment to the environment. We strive to reduce energy consumption **every year** by adopting innovative technologies in different aspects of production though increasing production capacity.

Tel: 972-4-698-8120/1
Fax: 972-4-698-0777

www.elcam-medical.com
Baram 1386000, Israel | sales@elcam.co.il

- Elcam utilizes local methods of environmentally-friendly energy generation (solar energy and natural gas) for self-consumption in its facilities in each country of operation. In this way Elcam has been able to reduce greenhouse gas emissions and air pollutants while increasing energy efficiency.

This Code outlines the standards for the ethical behavior for all of Elcam's work force, including our board of directors, managers, employees and agents. It aims to create the ethical ground for environmental, social and governance responsibility. It is not intended to provide complete guidance for conduct, but to restate the basic principles of expected behavior.

Grievance Procedure and Questions

- Employees and all stakeholders are welcome to contact the Chief Human Resources Officer if they have any questions regarding the Code of Conduct.
- In case an employee, or any stakeholder, feels there is any need, they can consult and/or report unethical behavior, including illegal, or violation of this code, without fear of harassment or retaliation, in the mail complaint box which is monitored by our Chief Human Resources Officer ethics@elcam.co.il. It is also possible for employees to leave a written complaint in the boxes located near each main cafeteria.
- Elcam Medical encourages consultation with the Chief Human Resources Officer when there is doubt as to the course of action to take in any particular case.
- Employees have personal responsibility and are expected to point out ethical failures even despite potential instructions from superiors in ethical contexts, or any other context that may occur.
- We rely on our managers to create a culture of confidence and reliability in which our employees understand their responsibilities and feel comfortable raising concerns without fear. Managers encourage the highest ethical behavior personally.

Elcam Medical operates in different countries, each may have a different implementation of the policy written in this Code and its reference documents.

The Code of Conduct is approved by Elcam Medical Board of Directors and will be reviewed on an annual basis and updated as necessary.

Tel: 972-4-698-8120/1
Fax: 972-4-698-0777

www.elcam-medical.com
Baram 1386000, Israel | sales@elcam.co.il