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**Dear Colleagues,**

At EVITA LLC, we all are responsible for understanding the important legal and ethical issues that affect our business and for acting with integrity at all times. Integrity means more than just complying with the law. It is one of EVITA LLC core values. It reflects who we are as a company and as individuals. Conducting ourselves with integrity helps us earn the trust and respect of the people we serve.

This Code of Conduct (commonly known as the "Code of Ethics") and its companion website [www.evitaalbania.com](http://www.evitaalbania.com) are essential resources for all colleagues. They outline EVITA LLC Policies on Business Conduct and identify the people who can answer any questions you might have about compliance-related issues. I am asking that you familiarize yourself with the Code of Ethics and bookmark the website as a reference to help ensure that you remain in compliance with all policies and procedures that apply to your work.

Please know that all EVITA LLC. leaders are available to you if you have any concerns related to company practices or regarding a colleague. Seeking advice, raising concerns, or reporting misconduct cannot and will not be held against you. Our open door and anti-retaliation policies are in place to encourage and protect colleagues who raise concerns.

Our commitment to do the right thing, which means complying with both the spirit and the letter of the laws that govern our industry, gives us a competitive advantage. Acting with integrity depends on each of us giving our full commitment. The responsibility lies with all of us — it's mine, it's yours, it's all of ours.

**Alqi Jani**

**Administrator**



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## 1. OWNING INTEGRITY

### OUR COMMITMENT

EVITA LLC counts on you to uphold our reputation and high standards by taking Ownership of performance with integrity.

- **Know the standards**, and live by them. By knowing, understanding and acting in accordance with EVITA LLC Values, applicable laws and Company policies, each of us can serve as a role model.
- **Ask questions.** You are expected to be familiar with the laws and policies that apply to your role. If you have questions, ask your manager or a member of the Legal or Compliance Division.
- **Raise concerns.** If you believe someone may be violating a law or policy, raise your concern. EVITA LLC management is dedicated to ensure that our standards are upheld and any concerns are addressed. Retaliation for raising a concern in good faith is strictly prohibited.
- **Always act with integrity.** You are never permitted to violate a law or policy, nor should you ever feel encouraged or pressured to do so.

### OUR STANDARDS

This Summary of EVITA LLC Policies on Business Conduct (the "Code of Ethics") is a guide to the Company's compliance structure and key standards. The Code of Conduct summarizes a number of corporate policies and procedures that govern doing business in a legal and ethical manner. All colleagues are subject to the laws and regulations of the country in which they work. In addition, all colleagues are responsible for understanding and following the EVITA LLC policies and procedures that apply to their roles and responsibilities. EVITA LLC also holds its vendors and contingent workers to high standards. They are expected to comply with all laws and all relevant policies that apply to their work conducted on EVITA LLC behalf.

### OUR RESPONSIBILITIES

As an EVITA LLC colleague, you share the privilege and responsibility of upholding the Company's reputation. You do this each time you act ethically and legally. There are situations in which making the right decision can be challenging. If you have a question or concern, reach out-there are many resources available to help you. You are also responsible for raising concerns about risks to the Company as soon as you are aware of potential issues-ideally, before these risks become actual problems. By raising concerns, you give management the opportunity to address potential problems and protect the Company, colleagues and the public.

If you reasonably believe that a colleague or anyone else doing work on behalf of EVITA LLC has violated or may violate a law or EVITA LLC policy, you have a responsibility to report that information immediately to your manager, another manager, etc. EVITA LLC has Open Door, anti-retaliation and confidentiality policies to help protect you. Retaliation against any colleague who in good faith seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited. Whenever you are in doubt, it is best to raise your concern.

### ANTI-RETALIATION

Retaliation against any colleague who in good faith seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited. Some examples of retaliation include: denial of benefits, termination, demotion, suspension, threats, harassment or discrimination. If any individual, regardless of his or her role in EVITA LLC, retaliates against a colleague who has truthfully and in good faith reported a potential violation, EVITA LLC will take appropriate action—even where no violation is revealed after

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investigation. However, if an individual has intentionally made a false report, the Company will respond accordingly.

#### CONFIDENTIALITY

It is essential that you feel secure when interacting with any element of the compliance program. Confidentiality will be maintained to the fullest extent possible. In some instances, however, it may not be possible to keep your identity confidential because of the nature of the investigation, the demands of conducting a thorough investigation or certain legal requirements.

## 2. OUR INDUSTRY

### • 2.1 OUR COMMITMENT

EVITA LLC is committed to act with integrity in all aspects of our work, including distribution, marketing, government interactions, sales and promotion. We will comply with all applicable laws and regulatory requirements. We will act responsibly in our relationships with all stakeholders including healthcare professionals, patients, consumers, hospitals, academics, governments, regulatory entities, business partners, customers, suppliers and vendors. We are committed to conduct our business in a way that ensures fair competition and we will be honest and fair in all our business dealings.

### • 2.2 HEALTHCARE LAWS AND REGULATORY REQUIREMENTS

EVITA LLC is subject to many rules and regulations designed to protect patients and consumers, improve the quality of medicines and healthcare services and help eliminate fraud and improper influence on medical judgment. We are committed to follow the laws and regulatory requirements that govern our business, including distribution, marketing, government contracting, sale and promotion of our products.

### • 2.3 ANTI-BRIBERY AND ANTI-CORRUPTION

EVITA established "Anti-Bribery and Corruption Policy", which applies to company, on January 01, 2016 with the aim of further strengthening our approach towards prevention of bribery and corrupt practices following the Medtech Europe Code of Ethical Business Practice.

EVITA declared in the Policy that it will take a "zero- tolerance approach" to bribery and corrupt practices and it promised that it will not perform any acts of bribery and corrupt practices and that it will establish and operate an in-house system to eradicate bribery and corrupt practices.

These approaches cannot be achieved within EVITA alone, and cooperation of all business partners relating to the business of EVITA will be indispensable.

The soundness of corporate activities based on corporate ethics and a law-abiding mentality, including prohibition of bribery and corrupt practices, is what forms the foundation for realization of EVITA's corporate philosophy, "We contribute to the healthier lives of people through the trading of pharmaceuticals."

### • Policy Statement

This Policy sets out the global anti-bribery and corruption policy applicable to EVITA.

It is EVITA' policy to conduct all business in an honest and ethical manner as a "Life Science Company". EVITA take a zero-tolerance approach to Bribery and Corruption and is committed to acting professionally, fairly and with integrity in all of its business dealings and relationships wherever they operate, implementing and enforcing effective systems to counter Bribery and Corruption.

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EVITA will uphold all laws and regulations relevant to countering Bribery and Corruption.

- **Applicable Scope**

This Policy applies to all Employees and Third-Party Representatives of EVITA.

- **Engaging Third Parties**

- Employees and Third Party Representatives must communicate EVITA's zero-tolerance approach to Bribery and Corruption to Third Parties at the outset of a business relationship with them and as appropriate thereafter.
- It is the responsibility EVITA to conduct due diligence prior to establishing a business relationship with Third Party Representatives and Third Parties in accordance with Local Policies considering such factors as territory, reputation, qualifications, honesty and openness, the manner and reasonableness of compensation and the relationship, if any, between any prospective Third Party Representative or Third Party with public officials, and the presence or absence of secret business partners.

- **Purpose of this Policy**

The purpose of this Policy is to:

- set out Employees' and Third Party Representatives' responsibilities in observing and upholding EVITA' position on Bribery and Corruption, and in maintaining fair trade practices; and
- provide Employees' and Third Party Representatives with information and guidance on how to recognize and deal with Bribery and Corruption issues.

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty may be punished by imprisonment and/or a fine. As an employer if a EVITA fails to prevent Bribery it may face fines, exclusion from tendering for public contracts, and damage to EVITA's reputation. EVITA therefore take their legal responsibilities very seriously.

- **Prohibited Conduct**

It is not acceptable for Employees and Third Party Representatives (or someone acting on their behalf) to:

- give, or promise or offer to give any Advantage with the expectation that any Advantage will be received in return, or to reward any business advantage already given in return;
- give, or promise or offer to give any Advantage during any commercial negotiations or tender process, if this is intended to or will influence the outcome;
- accept, or promise or offer to accept any Advantage from a Third Party that they know or suspect is offered with the expectation that EVITA will provide any Advantage for them or anyone else in return;
- give, or promise or offer to give, or accept, or promise or offer to accept any Advantage to or from government officials or representatives, or politicians or political parties without prior approval in accordance with Local Policies; or
- Engage in any other activity that will lead to a breach of this Policy.

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- **Record-Keeping**
  - Employees and Third Party Representatives must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to Third Parties in accordance with their Local Policies.
  - Employees and Third Party Representatives must submit all expenses claims relating to payments to Third Parties and record the reason for expenditure in accordance with their Local Policies.
  - All accounts, invoices, and other records relating to dealings with Third Parties should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.
  
- **Responsibilities of Employees and Third Party Representatives**
  - Employees and Third Party Representatives must read, understand and comply with this Policy and applicable Local Policies.
  - The prevention, detection and reporting of Bribery and Corruption are the responsibility of Employees and Third Party Representatives. Employees and Third Party Representatives are required to avoid any activity that will lead to, or suggest, a breach of this Policy.
  - Employees must follow notification procedures defined in Local Policies and Third Party Representatives must report to their contact person of EVITA immediately, if they believe or suspect that a conflict with this Policy has occurred, or may occur in the future. For example, if a client or potential client offers them something to gain any Advantage with a EVITA, or indicates to them that a gift or payment is required to secure their business, Employees must follow their local notification procedures and Third Party Representatives must report them to their contact person of EVITA immediately. Further "red flags" that may indicate Bribery or Corruption are set out in Clause 10.
  - If Employees or Third Party Representatives are offered a bribe, or are asked to make one, or if believe or suspect that any Bribery, Corruption or other breach of this Policy has occurred or may occur, Employees must report it in accordance with Local Policies immediately and Third Party Representatives must report it to their contact person of EVITA immediately.
  - If Employees and Third Party Representatives are unsure about whether a particular act constitutes Bribery or Corruption, Employees must report it in accordance with Local Policies and Third Party Representatives must report it to their contact person of EVITA immediately.
  
- **No Retaliation**
  - Employees and Third Party Representatives must not retaliate against another individual who has refused to commit a Bribery offence or who has raised concerns under this Policy.
  - Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. EVITA aims to encourage openness and no retaliation in any form whatsoever is permitted by the EVITA against anyone who reports or gives a statement in connection with a complaint.

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- EVITA are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in Bribery or Corruption, or because of reporting in good faith their suspicion that an actual or potential Bribery or Corruption offence has taken place, or will take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If an Employee or Third Party Representative believes that they have suffered any such treatment, Employees should report it in accordance with Local Policies immediately and Third Party Representatives must report it to their contact person of EVITA immediately.

- Breaches of this Policy

Any Employees who breach this Policy will face disciplinary action in accordance with Local Policies, up to and including dismissal.

EVITA will take appropriate action against any Third Party Representatives if they breach this Policy.

- Potential Risk Scenarios: "Red Flags"

If Employees or Third Party Representatives encounter any of these red flags while working for a EVITA, Employees must report them in accordance with Local Policies immediately and Third Party Representatives must report them to their contact person of EVITA immediately:

- they become aware that a Third Party engages in, or has been accused of engaging in, improper business practices, such as Bribery, Corruption, acquisition of private gain and abuse of position;
- they learn that a Third Party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special close relationship" with foreign government officials;
- a Third Party insists on receiving a commission or fee payment before committing to sign up to a contract with EVITA, or carrying out a government function or process for EVITA;
- a Third Party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- a Third Party requests that payment is made to a country or geographic location different from where the Third Party resides or conducts business;
- a Third Party requests an unexpected additional fee or commission to "facilitate" a service;
- a Third Party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- a Third Party requests that you provide employment or some other advantage to a friend or relative;
- they receive an invoice from a Third Party that appears to be non-standard or customized or not issued in compliance with relevant laws and regulations;
- a Third Party insists on the use of side letters or refuses to put terms agreed in writing;

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- they notice that we have been invoiced for a commission or fee payment that appears excessive given the service stated to have been provided; or
- A Third Party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.

- **Responsibility for this Policy**

- The Executive Officer in charge of Legal Affairs of EVITA, has overall responsibility for ensuring this Policy complies with our legal and ethical obligations.
- The President (or equivalent) of EVITA has primary oversight and responsibility for ensuring implementation of this Policy via Local Policies.
- Supervisors of EVITA is responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it.
- Employees and Third Party Representatives are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to their President (or equivalent), Compliance Officer, Legal Department or otherwise in accordance with Local Policies.

- **2.4 GOVERNMENT OFFICIALS**

No colleague nor anyone acting on EVITA LLC behalf may ever offer, authorize or provide a payment or benefit that is intended to improperly influence—or even appears to improperly influence—a government official, or to gain any unfair business advantage. Most countries in which we do business have laws that forbid making, offering or promising any payment or anything of value (directly or indirectly) to a government official when the payment is intended to improperly influence an official act or decision to award or retain business or gain a business advantage.

- **2.5 COMMERCIAL INDIVIDUALS AND ENTITIES**

EVITA LLC also prohibits “commercial bribery.” Generally, commercial bribery is giving, offering, requesting, accepting or receiving something of value to or from an individual or company to secure an improper advantage in commercial conduct. EVITA LLC prohibits any colleague or anyone acting on EVITA LLC behalf from directly or indirectly engaging in any form of commercial bribery.

- **2.6 ANTITRUST AND COMPETITION LAWS**

Antitrust and competition laws protect free enterprise. While these laws are complex and difficult to summarize, at a minimum they prohibit agreements between EVITA LLC and our competitors that affect prices, terms or conditions of sale or fair competition. It is your responsibility to be aware of these laws and their implications, including how they apply in the country in which you operate.

EVITA LLC prohibits:

- discussions or contacts with competitors about pricing, costs, or terms or conditions of sale;
- discussions or contacts with suppliers and customers that unfairly restrict trade or exclude competitors from the marketplace;
- agreements with competitors regarding allocating markets or customers; and
- agreements with others to boycott customers or suppliers.

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➤ **2.7 ENSURING AND MONITORING THE SAFETY, QUALITY AND PERFORMANCE OF OUR PRODUCTS**

We are committed to providing products that are safe, effective and of the highest quality. Understanding a product's safety profile, as well as its quality and performance characteristics, is essential. That's why we all share responsibility for reporting safety, quality or performance issues concerning EVITA LLC products. We may learn of adverse events or issues with an EVITA LLC product in many ways, such as telephone calls, websites, information received from EVITA LLC programs and studies, meetings or casual conversations. Colleagues are responsible for forwarding this information to the local Drug Safety Unit or appropriate EVITA LLC contact within 24 hours from when the information is received; reporting responsibilities and timeframes for vendors and contingent workers may vary depending on role. Certain instances that may lead to increased risk of an adverse event also should be reported. These include, among other things, medication errors such as incorrect prescribing, as well as any situation in which a fetus or baby may have been exposed to a EVITA LLC product during pregnancy or breastfeeding. Not only do we have an ethical and scientific responsibility to collect, process and evaluate this information, we also have a legal obligation to track and report relevant safety and quality information to regulatory authorities.

**3. OUR COMPANY**

➤ **3.1 OUR COMMITMENT**

EVITA LLC is committed to pursuing sound growth and earnings, while maintaining integrity in all that we do. We will abide by all applicable laws, regulations and other standards. We will operate in the best interests of the Company and our shareholders, be forthright about our operations and performance, and exercise care in the use of assets, information and resources. We will avoid conflicts of interest and use social media responsibly.

➤ **3.2 REPORTING ACCOUNTING FRAUD**

It is your responsibility to report any unrecorded funds or assets, or false or artificial entries in the books and records of the Company, if you become aware of them. If you learn of or suspect accounting fraud, report it immediately by contacting the Compliance Division or Corporate Audit.

➤ **3.3 BOOKS AND RECORD KEEPING**

Accurate business records are essential to the management of the Company and to maintain and safeguard investor confidence. They also help EVITA LLC fulfill its obligation to provide full, accurate and timely financial and other disclosures. All of EVITA LLC books, records and accounts must fully and accurately reflect the Company's business transactions. These include financial statements as well as time sheets, vouchers, bills, invoices, expense reports, payroll and benefits records, performance evaluations and other essential Company data.

➤ **3.4 CONFIDENTIAL AND PROPRIETARY INFORMATION**

The products, services, ideas, concepts and other information we create and collect on a daily basis are important proprietary assets for EVITA LLC. These include marketing plans, sales data, clinical and medical data, customer and colleague records, pricing data and information about business development opportunities. It is important that we all protect and prevent inappropriate or unauthorized access to or disclosure of this information, as well as third party information provided to EVITA LLC.

Help protect EVITA LLC by following these principles:

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- be careful when using electronic means of storing and sending information;
- don't provide confidential or proprietary information to third parties, including business partners and vendors, without appropriate authorization and any required confidentiality agreements. If in doubt, check with your manager;
- don't discuss confidential information in places where you can be overheard;
- secure all confidential information when working in an open environment;
- dispose of confidential or proprietary information properly; and
- beware of informal telephone or email requests from outsiders seeking information (commonly known as "phishing").

### ➤ 3.5 PRIVACY OF PERSONAL INFORMATION

Preserving the privacy of personal information is critically important. Personal information is information that can directly or indirectly identify an individual, such as name, contact information, and health-related and genetic information. Colleagues, healthcare providers and many others entrust EVITA LLC with personal information. Research, pharmacovigilance and other business activities also may give EVITA LLC access to personal information. EVITA LLC, its business partners and its agents are accountable for protecting personal information and for processing it only within the boundaries of applicable law, and EVITA LLC policies and procedures.

Help protect the privacy of personal information, including personal health information, by following these principles:

- comply with applicable laws and regulations of the jurisdictions in which personal information is collected and used;
- collect and use the minimum amount of personal information necessary to achieve legitimate business purposes and keep it only as long as necessary to achieve those purposes;
- share personal information only with individuals who have a legitimate need for it and will protect it properly;
- follow Company guidelines for handling and destroying personal information; and
- report "Data Privacy Incidents"—if you learn of an inappropriate disclosure of personal information, immediately notify your manager.

### ➤ 3.6 CONFLICTS OF INTEREST

A conflict of interest arises when you place your personal, social, financial or political interests before the interests of the Company. Even the appearance of a conflict can damage your reputation or that of the Company. However, many potential conflicts of interest can be resolved in a simple and mutually acceptable way. While EVITA LLC respects your right to manage your investments and does not wish to interfere with your personal affairs, you are responsible for avoiding situations that present—or create the appearance of—a conflict between your interests and those of the Company.

Any potential conflict of interest must be disclosed to and approved by your manager. The Compliance or Legal Division must be consulted in certain situations. You must comply with EVITA LLC Corporate Policy as well as any local and divisional conflict of interest policies that apply to your role, which may be more restrictive than the corporate policy.

The following are examples of potential conflicts of interest.

**Personal Investments or Transactions.** Conflicts of interest may arise if you or a family member: has a substantial financial interest in a EVITA LLC supplier, competitor or customer; has an interest in a transaction in which it is known that EVITA LLC is, or may be, interested;

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takes advantage of EVITA LLC corporate opportunities for personal profit; or receives compensation from a EVITA LLC supplier, competitor or customer.

**Personal Relationships.** EVITA LLC discourages hiring close personal friends or relatives in the same business unit. A potential conflict arises if you hire, manage or otherwise do business with a close personal friend or relative or someone with whom you have an intimate relationship. The actions of family members and friends outside the workplace can also create a conflict if their actions cause you to lose your objectivity in the workplace.

**Gifts, Entertainment and Other Items of Value.** You and your immediate family may not give or accept gifts, services, perks, entertainment, discounts, loans or other items of more than modest value by local standards, to or from those who are doing business or seeking business with the Company. Items of modest value are permitted only if they are not given or received on a regular or frequent basis, and if they are not solicited by EVITA LLC colleagues. Refer to Corporate Policy and any local and divisional conflict of interest policies that apply to your role for details, including monetary limits.

## 4. OUR COLLEAGUES

### ➤ 4.1 OUR COMMITMENT

EVITA LLC is committed to treat our colleagues and job applicants with fairness and respect. Our policies prohibiting discrimination, harassment and retaliation are global policies intended to create a workplace that promotes a positive and productive environment. We believe in cooperation, teamwork and trust, which contribute to a positive work environment. Hostility and harassment are not tolerated.

### ➤ 4.2 ANTI-RETALIATION POLICY

Retaliation against any colleague who in good faith seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited. If any individual, regardless of his or her role in EVITA LLC, retaliates against a colleague who has truthfully and in good faith reported a potential violation, EVITA LLC will take appropriate action—even if no violation is revealed upon investigation.

### ➤ 4.3 EQUAL EMPLOYMENT OPPORTUNITY

It is the Company's policy to provide equal employment opportunities and to treat applicants and employees without regard to personal characteristics such as race, color, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by state or local law), the presence of a mental or physical disability, veteran status or other characteristics protected by applicable laws. Managers are responsible for ensuring compliance with this policy. Each operating unit should periodically monitor, report and, if necessary, improve its performance in the area of equal opportunity.

### ➤ 4.4 DISCRIMINATION OR HARASSMENT

EVITA LLC promotes and values a work environment free of verbal or physical harassment. This includes any unwelcome comments or actions regarding race, color, ethnicity, creed, ancestry, religion, gender, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by state or local law), the

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presence of a mental or physical disability, veteran status or other characteristics protected by applicable laws. This policy applies to conduct that: is made a condition of employment; is used as a basis for employment decisions; creates an intimidating, hostile or offensive working environment; or unreasonably interferes with an individual's ability to work. Colleagues who engage in acts of harassment or discrimination are subject to corrective action that may include termination of employment (subject to applicable law). Managers are responsible for maintaining business units that are free of harassment and discrimination. EVITA LLC is also committed to providing an environment that is free of retaliation. If you experience or are aware of any discrimination or harassment, you can report it using any of the many channels available for raising concerns, including those described in this Code of Ethics.

#### ➤ **4.5 LABOR AND HUMAN RIGHTS**

Evita believes all workers deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and the company shall uphold the highest standards of human rights.

#### ➤ **4.6 PREVENTION OF INVOLUNTARY LABOR AND HUMAN TRAFFICKING**

The company ensures that all work is voluntary and shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of their exploitation.

The company ensures not to withhold workers' original government-issued identification and travel documents and guarantees that workers' contracts clearly convey the conditions of employment in a language understood by the workers. The company does not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities.

Workers shall not be required to pay employers' or their agents' recruitment fees or other similar fees to obtain their employment.

The company guarantees to hire workers who are at least 18 years of age, the applicable minimum legal age for employment as required in the local law.

#### ➤ **4.7 SUBSTANCE ABUSE**

Substance abuse can pose serious health and safety hazards in the workplace. We are committed to achieving an environment free of substance abuse for the health and well-being of colleagues and for the benefit of the Company. EVITA LLC formal policy and guidelines are compassionate but firm. The use of illegal drugs and the misuse of alcohol and other substances, including over-the-counter or prescription drugs, is prohibited in the workplace. The workplace includes anywhere that a colleague is conducting EVITA LLC business, regardless of time or location.

Subject to local laws and practices, EVITA LLC may conduct pre-employment drug testing and colleagues may be tested if they display unusual or erratic behavior such that there is a reasonable suspicion of substance abuse. In addition, where permitted by law, colleagues may be subject to additional testing, including unannounced testing on a random basis.

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## 5. OUR COMMUNITY AND THE PUBLIC

### ➤ 5.1 OUR COMMITMENT

EVITA LLC is committed to participating actively in and improving the communities in which we do business. As a member of today's rapidly changing global community, we strive to adapt to the evolving needs of society and contribute to the overall health and wellness of our world. We work to protect the environment, and the health and safety of those who work for and with us. We cooperate with local governments, respond appropriately to inquiries from the public and conduct political activity responsibly.

### ➤ 5.2 PROTECTING THE ENVIRONMENT, AND HEALTH AND SAFETY

Protecting the environment, and the health and safety of our colleagues, contingent workers, visitors and the communities in which we operate is a business priority and is core to EVITA LLC Values.

We are committed to:

- ensuring compliance with all applicable environmental, health and safety (EHS) laws and internal standards;
- continuous improvement of our EHS performance;
- selecting suppliers and business partners with consideration of their ability to run safe and environmentally responsible operations;
- educating, training and motivating colleagues to work in a safe, environmentally responsible manner;
- fostering openness and dialog on EHS matters with internal and external stakeholders, and communicating risk, performance and progress.

**Colleagues and contingent workers are responsible for:**

- **understanding and complying with applicable EHS requirements;**
- **reporting to their managers or local EHS function injuries and illnesses at work, and any other issues that could impact the environment, health or safety;**
- **reporting concerns about potential non-compliance to their managers, to the local EHS function or through other reporting methods described in this Code of Ethics.**

## 6. Compliance monitoring

All employees of Evita LLC have the responsibility to ensure compliance at the company. They must understand and follow the guidelines applicable to their role, and be attentive to areas which may require improvement.

Top Management ensures that these standards are followed at all times.


Evita LL has a Quality & Compliance department which is responsible for establishing, following an audit program and conducting internal audits at planned intervals, in order to identify issues and take corrective and preventive actions, as needed.

The audit is supported by collaborating with internal auditors and ensuring that the company is compliant with relevant standards and Medtech Europe Code of Ethical Business Practice.

If any actual or suspected misconduct within Evita is detected, all employees are encouraged to report them toward Compliance department, in order for us to continuously improve.

Reporting of misconduct is in line with Evita values and our Code of Conduct.

## THE EVITA LLC VALUES

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Collaboration  
Community  
Customer Focus  
Innovation  
Integrity  
Leadership  
Performance  
Quality  
Respect for People