



Appendix 5 - CODE OF CONDUCT

1. Introduction

The Viedoc Technologies Code of Conduct applies to all activities for everyone working for Viedoc Technologies AB and its subsidiaries (hereinafter “**Viedoc Technologies**”).

This Code of Conduct is based on the commitment to conducting our business with honesty and integrity and we expect all employees and consultants to represent the organization in the best way. We believe that a culture of respect, transparency and accountability is a good basis for optimal collaboration and business value.

- 1.1. To protect human rights, promote fair and safe employment conditions, responsible management of environmental issues and high ethical standards, the Code of Conduct applies in all contexts at Viedoc Technologies.
- 1.2. In areas where we have influence, Viedoc Technologies will endeavor to ensure that our partners comply with our code of conduct.

This Code of Conduct should be read together with the other SOPs, policies, and guidelines in the Viedoc Technologies quality system.

2. Responsibility and Whistleblowing (reporting potential violations)

This Code of Conduct applies to all employees, the Board, advisors, representatives, consultants, and others who work for or represent Viedoc Technologies and/or any subsidiary (hereinafter “**Employees**”).

- 2.1. The management group is responsible for the implementation of this Code of Conduct.
- 2.2. All Employees have a responsibility to be aware of our policies and guidelines, and what they mean. All Employees must accept these principles and act accordingly. Viedoc Technologies requires all Employees to always comply with all Viedoc Technologies policies in place at all times, including, but not limited to, Viedoc Technology's Information Security Policy and this Code of Conduct. Any breach of this requirement could result in consequences for the future employment/engagement with Viedoc Technologies and/or any subsidiaries including, but not limited to, reasonable penalties or termination of employment if permitted by applicable law.
- 2.3. All Employees must notify Viedoc Technologies as soon as possible if they become aware of any potential violations of this document or the law or if they have been requested to engage in conduct which violates this Code of Conduct or is to be considered as unethical.

- 2.4. Employees can report suspected misconduct to any of the following recourses: (i) the Line Manager, (ii) any member of the HR department, (iii) any member of the Legal department or (iv) through the Viedoc Whistleblowing Portal, available on Viedoc.com. Viedoc Technologies promotes transparency and integrity and would like all Employees to feel comfortable reporting any concerns to their line manager, but if the reporter would like to remain anonymous, they can report their concern through the Viedoc Whistleblowing Portal.
- 2.5. Viedoc Technologies will promptly investigate all reported violations. If a violation is confirmed, Viedoc Technologies will take appropriate action.
- 2.6. Viedoc Technologies will not tolerate any retaliation against an Employee who has reported a potential violation under this Code of Conduct in good faith, or cooperated with an investigation into reported misconduct. However, filing a report, which the Employee knows is false, or should know to be false, is prohibited and subjects that Employee to appropriate discipline, which could include termination.

3. Corporate

- 3.1. Viedoc Technologies shall be an honored, respected, and trusted partner in clinical drug and device development, offering clients the services required to achieve market authorization and penetration.
- 3.2. Viedoc Technologies is characterized by a competent leadership, well-defined roles, respect, transparency, openness, and long-term commitment in a positive environment.
- 3.3. Viedoc Technologies shall be continuously informed about clients' needs and expectations, and meet these with optimal competence, service, and product quality. Regulatory compliance will be monitored by the Quality Assurance department, who will monitor regulatory authorities for relevant and applicable standards, guidelines, and recommendations.

4. Respect for Individuals and for Human Rights

- 4.1. We support and respect internationally proclaimed human rights. We will ensure we are not complicit in human rights abuses.
- 4.2. Viedoc Technologies strongly emphasizes the importance of education and training and offers all Employees the possibility to develop individual and professional performance, thus contributing to the existence, profitability, and expansion of the company. All Employees shall be treated with equal respect and dignity, and our relationship with our Employees will be based on mutual respect and trust.

- 4.3. We offer our Employees fair and reasonable working conditions.
- 4.4. We strive to attract, develop, and retain qualified and motivated people in a professional environment.
- 4.5. Our Employees will be offered a safe and healthy work environment, which we are constantly trying to improve. Relevant health and safety information is provided to Employees. Viedoc Technologies regularly monitors and improves the physical and psychological working environment at Viedoc Technologies. Employment conditions offered to our Employees should be easy to understand and meet the minimum requirements under national law and / or collective agreements and the relevant ILO conventions.
- 4.6. We strive to pay fair wages and benefits in accordance with relevant standards in the countries where we operate.

5. Child Labor and Forced Labor

- 5.1. We do not accept child labor. Viedoc Technologies does not employ minors. Exceptions may be granted by the CEO in special circumstances (for example work practice programs for school children).
- 5.2. We do not accept forced labor or other forms of involuntary labor. Employees are free to leave their employment after a period of notice in accordance with national law and their contract.
- 5.3. Employees do not need to deposit money with or submit identification documents to Viedoc Technologies to work here.

6. Workplace Responsibilities

- 6.1. All Employees must be treated with respect and dignity. Physical punishment, physical or verbal abuse or other harassment and threats is prohibited.
- 6.2. Viedoc Technologies aims to ensure that every Employee is treated fairly, respectfully, and equally at the workplace.

7. Discrimination

- 7.1. Viedoc Technologies is a non-discriminatory organization. We offer all Employees equal opportunities regardless of gender, nationality, religion, age, ethnic background, or other distinguishing characteristics.

- 7.2. We are actively working for a company and a workplace free from discrimination and harassment and to embrace diversity and show that we respect diversity and cultural differences in daily operations.
- 7.3. Employees with the same qualifications, experience and performance receive equal pay for equal work in relation to their relevant benchmark.
- 7.4. We will respect the rights of our Employees to gather and act together. Our Employees have the right to form or join trade unions.

8. Anti-Corruption and compliance

- 8.1. All Employees are expected to exhibit honesty and integrity in their interactions with colleagues, members, suppliers, business partners, organizations, and public authorities. Viedoc Technologies has zero tolerance for all forms of corruption.
- 8.2. The misuse of a position of trust for private gain or the gain of Viedoc Technologies (e.g., by giving or accepting bribes) is not acceptable. It is forbidden to offer, promise, request, accept a promise of or accept a bribe. A bribe in this context is any gift or benefit that can affect the decision in an inappropriate manner or that can appear to affect the decision in an inappropriate manner.
- 8.3. Employees of Viedoc Technologies do not offer, give, accept, or solicit gifts, favors, entertainment or other benefits that:
 - Stand in conflict with organizational general rules.
 - Have an unreasonable value.
 - Consist of money or the like, or other forms of personal payment in the form of discounts, commissions, bonuses, or percentage payments.
 - Consist of leisure or holiday travel.
 - Conflict with applicable laws and / or exceed local customs
 - Are offered to employees in the public sector in connection with the purchase or exercise of governmental authority.
 - Risk unduly affecting the receiver in the exercise of his or her profession due to other benefits, based on their value or other relevant factors.
 - Gifts to a maximum value of SEK 400 are acceptable. Gifts to a higher value can be given only after the approval of the CEO.

- In the case where a gift of a value higher than SEK 400 is received, the CEO should be informed for a decision on how to treat this gift.

8.4. This will not prevent Viedoc Technologies Employees from accepting or offering benefits to maintain or promote good business relationships with customers or other partners, provided that such benefits are reasonable, accepted and offered openly and are generally in accordance with this Code.

9. Fair Competition

9.1. Viedoc Technologies supports healthy competition.

9.2. Employees of Viedoc Technologies must comply with all relevant rules of competition and refrain from entering into illegal agreements or exchanging sensitive information, such as price and / or marketing information, with competitors.

10. Conflicts of Interest

10.1. Viedoc Technologies' organization is politically and religiously independent, and our Employees should be working for the good of Viedoc Technologies. Viedoc Technologies assumes no political or religious views and does not use the organization as a platform to support political campaigns or other political / religious purposes.

10.2. Viedoc Technologies' Employees should always work for the best interests of Viedoc Technologies and avoid any behavior that could be perceived as favoritism for a specific company, organization, individual or other interest at the expense Viedoc Technologies or in front of another company / organization. Viedoc Technologies Employees must avoid any situation that could be perceived as a conflict with the organization's interests since that could have a negative effect on the Employee's judgment and integrity.

10.3. Employees with potential conflict of interests must report that activity to the Line Manager who will review the situation together with the Legal department.

11. Information Security, Protection of assets and confidentiality

- 11.1. Viedoc Technologies strongly emphasizes the importance of secrecy to ensure that no information gained through collaboration with clients, or any other classified information, is disclosed.
- 11.2. Viedoc Technologies' Employees may not provide, disclose, or misuse confidential information such as non-public information about Viedoc Technologies' operations, results, strategies, business plans, etc. and must handle company assets (such as laptops and smartphones) with great care and protect them against unauthorized access and use. Inappropriate use of company assets or illegitimate disclosure of business-related information to anyone can cause serious harm to Viedoc Technologies.
- 11.3. Viedoc Technologies requires all Employees and others who perform services for Viedoc Technologies (where relevant) to sign a confidentiality agreement. The obligation to preserve confidential information continues even after the termination of employment or consultancy work has ceased.

12. The Environment

- 12.1. Viedoc Technologies and all its Employees should strive to make the most environmentally sound choice wherever and whenever possible, in all our actions, to minimize the impact on the environment as much as possible.
- 12.2. Examples of questions we all should ask ourselves when it comes to a choice are:
 - Do I need to use my car, or can I choose a more environmentally friendly alternative?
 - Do I need to print this document, or can I read it on the computer?
 - Do I need to make this travel, or can I arrange a web conference?
- 12.3. With this mindset and approach, we contribute to a sustainable business with respect for the environment.

13. Trade Compliance

- 13.1. Viedoc Technologies adhere to trade control regulations, sanctions and other efforts intended to promote international peace and stability. We are committed to observing all applicable export and import laws, including trade sanctions, embargoes, and other laws, regulations and government orders or policies whether imposed by the local government or by foreign governments with jurisdiction over a transaction.

14. Accurate books, records and tax declarations

- 14.1. At Viedoc Technologies, we comply with relevant financial reporting and accounting standards and principles, as well as tax laws and regulations. We follow all applicable laws designed to prevent money laundering. Keeping accurate books and records as well as declaring all tax-relevant matters truthfully is an indispensable part of running a lawful and transparent business in a sustainable way.

15. Data protection

- 15.1. Viedoc Technologies strictly adheres to the laws designed to protect and secure the privacy and confidentiality of information about individuals. The processing of personal data in any department or business process is subject to prior approval of our Data Protection Officer.