

CODE OF CONDUCT

INTRODUCTION

This Code of Conduct document describes the set of rules outlining the social norms and rules of responsibilities that apply to all employees of the RR Mechatronics group as well as to the RR Mechatronics legal entities as such.

ETHICAL OPERATION

RR MECHATRONICS is committed and expects its associates and relevant third parties to be committed to conducting its business ethically and in compliance with all applicable laws and regulations. This includes compliance with anti-bribery and anti-corruption laws such as the Foreign Corrupt Practices Act and the UK Bribery Act, as well as all other applicable legislation in the countries where we either direct or indirectly operate.

We conduct our business free of corruption. We believe in doing business fairly, and free of any corrupt influence. Engaging in bribery or other forms of corruption yields no long-term benefit for our company. In fact, by offering or accepting a bribe, we would compromise RR MECHATRONICS's integrity and put our company, and ourselves, at risk.

We will not:

- a) Make, offer, or promise a compensation to a third party, including a public official or government personnel.
- b) Offer or accept a "kickback," or the return of a sum paid or due to be paid as a reward for making business arrangements.
- c) Retain a third party to pay an emolument or kickback on our behalf, or knowingly allow one to do so.
- d) Make "facilitation payments," or payments made to speed up routine government actions.
- e) Turning a blind eye to our suspicions of bribery, facilitation payment or corruption.

We strive to build healthy, lasting relationships with all of our business partners. The exchange of gifts and entertainment can be instrumental. However, this practice can easily lead to a conflict of interest, or the appearance of one, if crucial guidelines are not followed when giving or accepting gifts, favors, or entertainment. Anything we provide to or accept from a third party will be:

- a) Reasonable in value (no more than 100 EUR).
- b) Infrequent.
- c) In good taste.
- d) Unsolicited.
- e) Not cash or cash equivalents, such as gift cards.
- f) In compliance with applicable laws and regulations.

RR MECHATRONICS values honesty and transparency in all that we do. Our financial books and records, which give a look inside our current market position and financial condition, shall be an honest, accurate, and complete view. Every piece of data that we submit in our company records—be it personnel, time, expense, or safety records—will be truthful, factual, and comprehensive. We will follow all applicable accounting requirements and internal controls when recording this information. We also will submit any appropriate contract documentation at all times.



CONDITIONS OF EMPLOYMENT – WORKING CONDITIONS

Being a key player in our industry requires us to work together as a team—a team that respects each other's differences and values each other's contributions. We place significance on fostering a diverse, inclusive work environment where all ideas, perspectives, and backgrounds are considered. None of us should face discrimination on the basis of our race, color, sex, sexual orientation, marital status, religion, political affiliation, nationality, ethnic background, social origin, age, disability, works council membership, or any other trait protected by law.

RR MECHATRONICS does not tolerate any form of unlawful harassment or bullying. Harassing behaviors may vary, but typically all share the purpose or effect of creating an intimidating, hostile, or offensive work environment. Examples of harassing acts include unwanted sexual advances, threats of violence, and offensive comments—none of which are acceptable at RRMECHATRONICS. The same is true of disrespectful behavior in general, including humiliating, insulting, intimidating, or isolating others.

At RR MECHATRONICS we feel strongly that our health and safety are paramount to the work we do.

RR MECHATRONICS shall provide a safe, fun place to work where our ideas and productivity can thrive. It is important for us to maintain these high standards for workplace safety, and hold each other accountable for our actions and behaviors. We will never sacrifice safety for the sake of productivity. We all will familiarize ourselves with and following the safety protocols and procedures in our location. If we feel that our work environment is unsafe we will inform our manager, supervisor, or another available resource know about it right away.

To further uphold the safety of our workplace, we will never work while impaired by alcohol, illegal drugs, or misused prescription drugs or over-the-counter medications.

We all have a right to privacy. Therefore, we have a responsibility to our colleagues to protect this information, consistent with the various privacy laws that apply to our work.

RR MECHATRONICS does not tolerate discrimination of or retaliation against anyone who, in good faith, makes a report of suspected wrongdoing. When we voice our concerns truthfully and accurately, we may do so without fear of negative consequences.

CORPORATE RESPONSIBILITY AND ENVIRONMENTAL POLICY

We are responsible corporate citizens.

RR MECHATRONICS believes in promoting human rights throughout its organization, adhering to all wage and hour laws in the locations we operate. We do not use or condone unlawful child or forced labor, and do not conduct business with those who do. Additionally, we expect our suppliers to uphold these same standards in the work they do for RR MECHATRONICS.

As innovators in the medical devices market, we are proud of the superior quality of our products. Upholding our commitment to quality and safety ensures those who use our products enjoy the best possible experience, while those who work with us in manufacturing, marketing, and distributing them may do so with confidence. To this end, we comply with applicable legislative and regulatory requirements throughout the development and production process.

We extend the same respect and courtesy to our competitors as we do our business partners. We treat others fairly, and never seek to obtain information about our competitors through illegal or unethical means. We do not misrepresent ourselves or our company in an effort to gather competitive data. Instead, we rely on lawful and publicly available channels to collect important competitive information. If a new employee joins us from a competing organization, we do not encourage or allow them to share confidential information about their



former employers.

We will never misuse any dominant market position that we have or may have.

Customers around the world enjoy our products, and we strive to make them globally available. In order to ship our products and obtain the goods and services to help produce them, we will comply with international trade laws. This extends to our compliance with the various export and import controls that apply to our work.

RR MECHATRONICS is mindful of our effect on our surrounding environment and willing to take steps to lessen our impact. To this end, we implement sustainable practices worldwide, striving to meet or exceed environmental laws and regulations. We seek to conserve resources, minimize waste, and make efficient use of water, energy, and raw materials. We hold our suppliers to similar standards of environmental excellence as well.

INTERACTION WITH HEALTH CARE PROFESSIONALS

RR MECHATRONICS recognizes our ethical responsibilities in any interaction with health care professionals or other parties related to the medical device sector. RR MECHATRONICS therefore applies the "Code of Conduct Medical Devices" as set out by the Dutch Foundation "Consultation body Medical Technology" ("stichting overleg medische technologie" -SOMT). This Code describes in detail the interactions between medical device providers and health care professionals or other parties related to the medical device sector.

The most relevant parts of this Code as implemented by RR MECHATRONICS are:

All our interactions with these parties are completely transparent and duly documented.

All expressions and statements regarding medical devices and medical research made or supported by RR MECHATRONICS are truthful, accurate, verifiable and not misleading.


Any remuneration for services rendered as part of mutual business, financial contribution to other activities or sponsoring is never linked to decisions regarding the purchase, prescription or recommendation of certain medical devices.

Product related meetings and events, required in relation to the decision making regarding the purchase or use of RR MECHATRONICS products, are appropriately organized to suit the intended purpose and do not unduly influence the decision making.

Health care related meetings and events, other than product related, whether commissioned, sponsored or otherwise supported by RR MECHATRONICS, are aimed at the advancement of medical science and health care and are of adequate content.

Clinical investigations, studies or other medical research, whether commissioned, sponsored or otherwise supported by RR MECHATRONICS, are conducted independently and unprejudiced according the accepted standards. RR MECHATRONICS never attempts to influence the results of such investigations.

Zwaag, The Netherlands,
September 2017


Jan Buis
CEO
