Ethical Trading Policy

1 Introduction

This Code articulates a framework that seeks to go beyond the mere compliance with the law; its spirit is guided by the integrity and professionalism in our decision-making, establishing a set of general principles, which should guide our everyday behaviour wherever we operate in the world. We all know the importance of acting with integrity and responsibility. The set of values, principles and ethical standards which are established in our Code go beyond protecting the image and reputation of our Company or avoiding legal problems. The integrity allows us to maintain a sustainable environment that we all are proud to belong to and strengthens our professional activity.

Our Code of Ethics will help us in decision making and is designed to guide our behaviour in all the business dealings we undertake in the course of the work. Business growth and maintaining high levels of operational standards in terms of management and compliance with regulations are mutually reinforcing elements. Building trust with the wider public is gradual and requires constant effort. Therefore, it is the responsibility of all of us to protect the company's reputation, which means acting with honesty and treating our internal and external collaborators, our customers, shareholders, partners and suppliers in a fair and honest manner.

2 Values

The quality of our services and the success of our business depend on many variables among them acting every day in a fair and honest manner as socially responsible persons. In order to achieve this, we must respect these core Code principles: -

- Compliance with employment laws
- Collaboration with public authorities
- Respect for the environment and all communities within which we operate
- Compliance with antitrust laws to serve as the foundation for economic development
- Mutual respect, dialogue and transparency are the foundations of relationships
- Recognition of the freedom of association with trade unions and the right to strike
- The will to serve with integrity, independence, and impartiality and to exceed the expectations of those who trust in our products and services.

3 Ensuring the Values

3.1 Setting our Goals

Creed Health will strive to achieve a zero rate of complaint in respect of breaches of our Ethical Trading policy by ensuring all employees are aware of the Policy and consequences of breaching the code.

3.2 Compliance with the Code

All personnel have the duty to know and comply with the Code. Each candidate accepting employment in company must expressly acknowledge and accept the Code and will receive specific compliance training accordingly. The companies we do business with will support the adoption of measures ensuring compliance with the laws and human rights similar to our own.

3.3 Creed Health Management
The obligation to comply strictly with the provisions of the Code is especially important for directors. The success of the Code depends on the commitment of everybody. A severe breach of the Code implies the loss of one's job, as determined by the Board of Directors.

The special commitment of the senior management inherits the following obligations: -

- All managers must take adequate measures of supervision ensuring that employees comply with the Code
- The recruiting and selection procedure for managers will consider their merits, capacity, and commitment to the Code's values.
- All managers must select their employees according to their qualification and their work performance. Any delegation of functions must be communicated precisely and in writing, informing them of their legal obligations and facilitating the degree of attribution required for performing delegated functions correctly.

3.4 Business partners and suppliers
Due to our commitment to the Code's values, we demand that our suppliers and business partners are professional and honest, giving priority to companies that embrace similar compliance standards to our own. This includes observation of human rights as outlined in the ethical trading initiative (ETI) base code.

This code applies to all product suppliers and manufacturers Creed Health deals with:

UMT Foshan Medical Technologies Ltd (Sorbsan™ Dressings, KytoCel™ Dressings)
MedCu technologies (MedCu™ Copper Dressings)
DEBx Medical B.V. (DEBRICHEM®)
Andover Healthcare Inc. (AndoFlex™ Compression Bandage Systems)
Genadyne Biotechnologies, Inc. (Genadyne™ UNO+ NPWT, Genadyne™ DUO NPWT)
Suru International PVT Ltd (Suru Speciality Needles)
Aspen Surgical Products Inc. (Aspen Surgical product range)
Metrum Cryoflex Sp. z o.o. (SWING 15® Laser, TWIST® Diode Laser, CRYO-S® Painless)

3.5 The Code of Ethics applies to everyone
The Code is binding on Creed Health, but we want to encourage all persons affected by our activities to help us to identify our ethical commitments. Therefore, we welcome any communications, such as consultations, questions or reports of incidents. They will immediately acknowledge receipt of suggestions and will respond as soon as possible by emailing us at info@creedhealth.co.uk.

Serious breaches of our code of ethics can be reported anonymously to whistleblowers@creedhealth.co.uk

3.6 Senior Management
Ensuring compliance with the Code seriously requires the establishment of new institutions and functions. The Senior Management oversees: -

- Publishing the Code and conducting necessary compliance training

- Enhancing and approving internal policies and proceedings as required for effective implementation of our values.
- Receiving and interpreting questions related to the Code and its proceedings
- Investigating any breach of the Code and proposing corresponding disciplinary measures

To ensure that Impartiality is an active institution, present in the day-to-day business, Senior Managers will manage specific issues or processes. The Managing Director will work to ensure all employees comply with the rules and regulations of regulatory agencies, that company policies and procedures are being followed, and that behaviour in the organisation meets the company's Code of Ethics.

3.7 Complaints

Creed Health maintains a philosophy and encourages any employee, collaborator or any person to make a complaint in good faith in connection with any breach of the Code, especially regarding severe irregularities committed in the exercise of their functions.

Complaints must be reported to a Senior Manager or emailed anonymously to whistleblowers@creedhealth.co.uk.

To grant maximum security and protection of the person reporting the breach, Creed Health commits itself to: -

- Strictly maintain the confidentiality of any complaint. Accordingly, Creed Health will not reveal the identity of the reporting person without their authorisation
- Investigate and sanction any kind of harassment or retaliation against the reporting person
- Inform the reporting person about any actions taken based on their complaint
- Comply with data protection related to the complaint system

3.8 Investigation and sanction of any breach

Creed Health undertakes to fully investigate any alleged breaches of the Code, infraction which may lead to disciplinary action include: -

- Authorising, participating, or perpetrating unlawful conduct in our business activity that might lead to the imposition of criminal or administrative sanctions against Creed Health and/or any Company Directors or Managers. Harassment or any kind of retaliation against any complainant
- Any breach of the Code or any related policy or proceeding.
- Covering up any data or information or obstructing investigations conducted in connection with possible breaches of the Code

Creed Health will impose disciplinary sanctions in accordance with the local employment legislation. Disciplinary sanctions are considered the last resort and are reserved for the most severe cases. Respect for the Code and commitment to the company values must be considered in each case of granting promotion within Creed Health.

No breach of the Code is justified. Employees cannot exclude themselves from the application of any legal provision, which may result in a breach of the Code. Similarly, employees may not rely on the fact the management had knowledge of the breach and that they were given instructions to

keep silent. In such cases, Creed Health personnel must report any facts via the Communication Channel to senior management.

3.9 Respecting dignity at the workplace
Creed Health is committed to this code, and it would not be credible if it were not reflected in the relationship with the employees based on dignity of every employee. The employment relationship shall be free of any abuse of authority of conduct that might seriously offend others.

3.10 Preventing health and safety risks and respecting employees' rights
A healthy work environment, respecting the dignity of the employees also includes respecting employees' rights.

Our Company will respect the international standards promoted by the International Labour Organization wherever it operates. The Creed Health Health and Safety Policy prevent risks and promote Health and Safety in the workplace.

All employees have a duty of care when it comes to health and safety. Therefore, all employees have the obligation to know and comply with the H&S policy.

3.11 Data protection
Managing any business today requires the protection of personal data gathered within the scope of employment. Although laws related to data protection vary in the different countries where we operate, Creed Health considers the following as fundamental: -

- Creed Health will design a Data Protection Policy based on the data protection laws applicable in each county and adapted to each legal framework.

In addition to all local laws, all employees or managers must respect these basic rules: -

- Except for Human resources and Legal, no officer or employee may access any personnel file other than their own without express authorization.
- Personal data may only be collected and filed to the extent necessary in order to achieve a legitimate business purpose, and such information may only be used for the purpose for which it is collected.

The personal data of the persons to whom the Code applies and who have the purpose to ensure compliance with the Code's provisions, may be used during investigations, independently of the country where these investigations take place, in accordance with applicable laws.

Personal data that is processed can only be communicated to third parties in order to comply with obligations directly related to the Company's activities, in all cases only with the permission of the person affected.

3.12 Environmental protection
Our company will respect all laws related to environmental Protection and is committed to sustainability. We therefore will comply with best practice guidelines

3.13 Market competition and customers
At Creed Health we believe compliance with antitrust laws are the bases for economic growth. Therefore, the following are strictly prohibited: -

- Any illegal agreement intended to share markets or to fix prices or bid rigging in the public or private sector.
- The improper use and/or disclosure of trade secrets or confidential information or intellectual property rights (such as trademarks, copyrights, and patents) belonging to third parties, for example, by means of industrial espionage.
- The making of any type of offer or advertising that could be misleading for clients.

Creed Health operates in the public and private sector and considers industry guidance on the ethical engagement with public sector workers, including but not limited to: -

- ABHI code of business practice
- Eucomed guidelines on the interaction with HCP's
- SDMA code of conduct
- NHS Supply Chain - Supplier Code of Conduct
- BMA Ethical Procurement for General Practitioners
- NHS - CONFLICT OF INTEREST - revised-CCG-Guidance
- NHS CONFLICTS OF INTEREST -guidance FOR STAFF AND ORGANISATIONS
- Bribery Act 2010

3.14 Fighting against corruption in Creed Health

Creed Health personnel and other persons operating for the Company have the duty to avoid any corrupt practice. Therefore, it is necessary to accept Creed Health supervision in order to prove the correctness of their policies and proceedings. Creed Health complies with national and international laws relating to the fight against corruption in all countries where we are established.

If your position at Creed Health requires frequent contact with public officials or business leaders, you must be familiar with company policy.

Creed Health prohibit the following activities: -

- Promises of any improper benefit to public officials or induce other companies' employees to breach their obligations in favour of Creed Health.
- Give favours to public officials or other companies' employees
- Use a personal relationship with a public official, a member of his/her family or with the leader of a political party in an improper manner to obtain a favourable decision for the Company.
- Pay money to persons (third parties) charged with managing business relationships with public administrations or other companies on behalf of Creed Health without prior confirmation of their professional integrity and their capability to comply with our Policy.
- Make payments to public officials, which may be allowed by law to obtain an authorization or to facilitate administrative proceedings.

3.15 Patronage, sponsoring and donations to Political Parties

As a socially responsible member of society, our Company will bring forward culture, science and arts and will collaborate with social and humanitarian projects. In relation to these projects, the patronage of academics as well as most collaborations with public administrations is allowed. In no event shall these contributions be made in relation to electoral propaganda events or as a means of bribing a public official seeking to obtain a personal benefit. In order to guarantee a high level of

security, any patronage must be approved by the person responsible ensuring compliance with the policy.

Creed Health maintains impartiality with respect to political parties. Therefore, any contribution to a political party anywhere in the world is prohibited.

3.16 Veracity and information security

Information is a basic element of managing a company and for this reason, guaranteeing the integrity and reliability and accuracy of information is everybody's job. We shall ensure the veracity of the data that we supply to public bodies such as tax and accounting information.
To this end, all staff must always adhere to the company IT policies.

3.17 Confidentiality

Depending on your position, you may have access to confidential information belonging to the company its clients or its suppliers. Due to our activities, we also have access to third party's sensitive information that we must protect. This includes an obligation not to disclose this information without the consent of the owner of the information.

3.18 Integrity in our services

Our services must be rendered in a professional, independent and impartial manner, according to the methods, procedures, practices and policies of Creed Health and the laws of each country.
The commitment to comply with applicable laws in our activities is based on our commitment to society, beyond civil, administrative, criminal or any other responsibility that might arise for Creed Health or our personnel.

The only way to create confidence in our services is to operate with complete independence. Therefore, we must avoid any conflict of interest, especially if Creed Health renders services to a client that, due to its nature, compromises his or her independent judgement. Internal policies define in a detailed way how to act in these cases.

Recommendations, professional opinions, data, results and generally any asserted facts must be documented in a careful manner, in compliance with senior management guidelines. Reports and certifications must include results and findings, as well as the corresponding opinion of the relevant professionals.

3.19 Conflicts of interest

Conflicts of interest might occur between Creed Health and its clients, but also may arise within the exercise of our activities. These situations must be avoided and the occurrence of any conflict of interest must be reported immediately to superiors or the Senior Manager in order to obtain further advice regarding how to proceed.

Common examples of conflicts of interest are: -

- Hiring family members or friends without authorization.
- Accepting in a direct or indirect way any benefit due to the position held within Creed Health, with exception of socially acceptable favours. Notwithstanding, employees are required to inform senior management about these situations.
- Carrying out any unauthorised business or transaction on behalf of Creed Health with any family member or with a company in which we have any direct or indirect interests.
- Carrying out any paid activity, in addition to the activities within Creed Health, without having obtained authorization from management.

- Rendering any competing service to Creed Health clients. Management must authorize any such services.
- Using our employment within Creed Health to secure any business or commercial opportunity.
- Failing to disclose to management interests that we might have in companies competing with Creed Health.

3.20 Use of Creed Health **resources**
As specified in the IT and related policies, corporate email is the property of the company and therefore, not appropriate for private use. PCs, phones and equipment shall only be used for business purposes.

Use of external files and software puts our security at risk, therefore the use of unauthorized software, software downloads of inappropriate content (e.g. pornography) or any action that violates intellectual property rights are prohibited.

The rest of Creed Health resources may only be used exclusively for developing our activities and in any case never for personal use. All personnel must take proper care of resources assigned to them and must avoid damage, theft or any improper use of such resources.

3.21 Acting with respect
Creed Health operates in various cultures, with different customs that we must learn about and respect, whilst acting in a respectful manner and according to the different social norms. Use of illegal narcotic drugs or alcoholic beverages at work or whilst conducting Creed Health business is strictly prohibited.

Signed

J R Karia

Jahnvi Karia, Managing Director

14th July 2026