

Our Code of Conduct

Integrity Matters







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## Integrity Matters at Mozarc Medical









## A message from Ven Manda, Mozarc Medical Chief Executive Officer

#### Colleagues,

We are building our company upon a foundation of innovation and integrity. That is how we have always gained the trust and confidence of patients, their caregivers, clinicians, and other stakeholders.

This starts with our culture. Our Code of Conduct guides how we should conduct our business across the globe. We must always put patients and quality first. Doing the right thing should never be in doubt. This is what it means to be part of the Mozarc family.

Having the courage to speak up, listening to each other's concerns, and working together to resolve issues – or to keep them from happening at all. These attributes are foundational to our culture - a culture built on integrity.

This is how we achieve our mission and vision of leading kidney health technology innovation and helping patients experience an improved quality of life.







### Our Code of Conduct

Our Code of Conduct reflects who we are as a company. It shows our commitment to our employees, patients, providers, customers, and communities.

Our Code outlines our commitment to ethical practices in all aspects of our business:

- In our workplace
- In our interactions with patients and customers
- In our business conduct

We expect the following people to conduct business according to our Code:

- Employees
- Contractors
- Our Board of Directors
- All other third-parties, as required by their contracts with us

Integrity Matters at Mozarc Medical







## How we lead with integrity

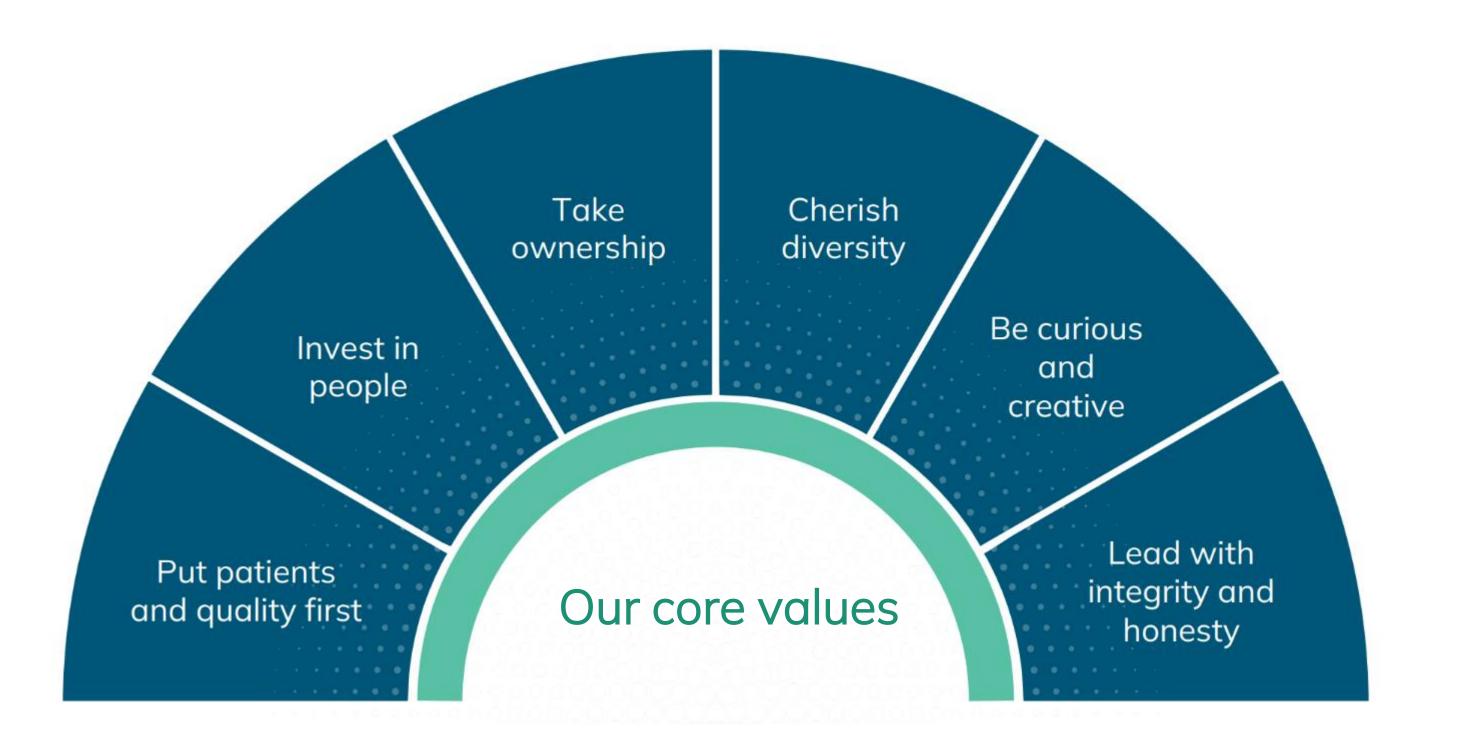
Our Code of Conduct builds on our mission, vision, and core values to guide our decisions at work every day.

#### Mission

We are singularly focused on enriching patients' lives by reshaping all aspects of kidney health with patient-centered technology solutions.

#### Vision

We will lead technology innovation to improve patient experience and reimagine kidney care.









## We follow the path to integrity

#### The path to integrity...

Each of us plays an integral role in supporting our ethical culture.

Our Code of Conduct is our guidepost to conducting business ethically. By following our Code, we always lead with integrity and honesty.

#### The path to wrongdoing...

We all face choices that can lead us in the wrong direction. Why might some people choose the wrong path?

- They seek financial, professional, or personal gain.
- They believe the benefits outweigh the risks of getting caught.
- They believe their decision will cause minimal harm.
- They assume they will behave ethically and fail to ask if their decisions aligns with our core values.

Tell someone if you see something concerning. Listen to others when they raise concerns.

Together, we can stay true to our core values.







# Aspire to do the right thing .... always

Our reputation is based on the actions each of us take every day. Every interaction with others is an opportunity to demonstrate that we lead with integrity and honesty at Mozarc.

- We do not change our standards because others behave poorly.
- We do not compromise our core values to meet financial goals.

Each of us needs to aspire to do the right thing ... every day... all the time.









## Our responsibilities

#### What we expect of all employees

- Act with integrity and honesty every day.
- Model the right conduct through your words and actions.
- Do not let the pressure to succeed make you do things you know are wrong. No one has the authority to make you do something that violates the Code.
- Speak up if you see or suspect misconduct or unethical behavior. That is always the right thing to do.
- Seek help if you have questions.

#### What we expect of all leaders

- Demonstrate a strong commitment to our Code through your words and actions.
- Create an environment that encourages taking calculated risks and learning from mistakes.
- Foster a workplace where employees feel comfortable coming to you with questions and concerns.
- Assure employees, contractors, and others that we will not tolerate any retaliation if they ask questions or voice their concerns.
- When you receive a concern, document it and escalate it through the correct channels.







### What if there isn't a rule?

In every decision you make, we count on you to use good judgment. There may be times where our policies and our Code don't specifically address your situation. In those situations, ask yourself these questions:

- Is it legal?
- Does it follow the Code and our policies? Does it align with our core values?
- Will it help us be a trusted partner to our patients, providers, and customers?
- If a competitor did this, would you be okay with their approach?
- Would you be comfortable if your actions were reported by the media?

If you answer "yes" to all of these questions, it is probably okay to proceed. If you answer "no" or "I'm not sure" at any point, stop and ask someone for help.

There may be situations where our Code may conflict with local law or custom. In those cases, contact our Legal & Compliance Team.







## Be bold and speak up

We are all responsible for encouraging open, honest, and full discussion on any issue related to compliance with our policies and procedures.

- Express your views.
- Defend your opinions.
- Ask questions when you have concerns.

We need you to be bold and speak up, even when you think a concern may be unpopular.









## Who should you tell?

If you see or experience conduct that is not consistent with our core values, talk to someone.

- Talk to your manager. They are often in a good position to understand and respond to your concern.
- Reach out to our Human Resources or Legal & Compliance teams, they are here to help you.
- Share your concern through the resources listed on Integrity Matters page of our Mozarc intranet site.

If you think you made a mistake and violated one of our policies, **tell** someone. We can then address the issue.







## What happens after sharing a concern?

#### Review

No matter how you raise a concern, it will be promptly reviewed.

Information you provide will only be shared with the people who need it to help address the issue.

#### Investigation

As necessary, concerns are investigated by a team with appropriate expertise. We will ensure this is a fair process.

During an ethical investigation, everyone involved must fully cooperate. All information must be provided immediately after the first request.

#### Outcome

If a concern is substantiated, Human Resources will recommend what, if any, disciplinary action is needed.

If you raised the concern, you will be told if the claim was substantiated or not.

To protect confidentiality, the details of the investigation and outcome will only be shared with those who need to know.







## Is retaliation permitted?

We prohibit any retaliation against anyone who reports a concern in good faith. We also prohibit retaliation against anyone who cooperates in an investigation.

If you believe you have been retaliated against, contact your local Human Resources representative or your regional Legal & Compliance lead.

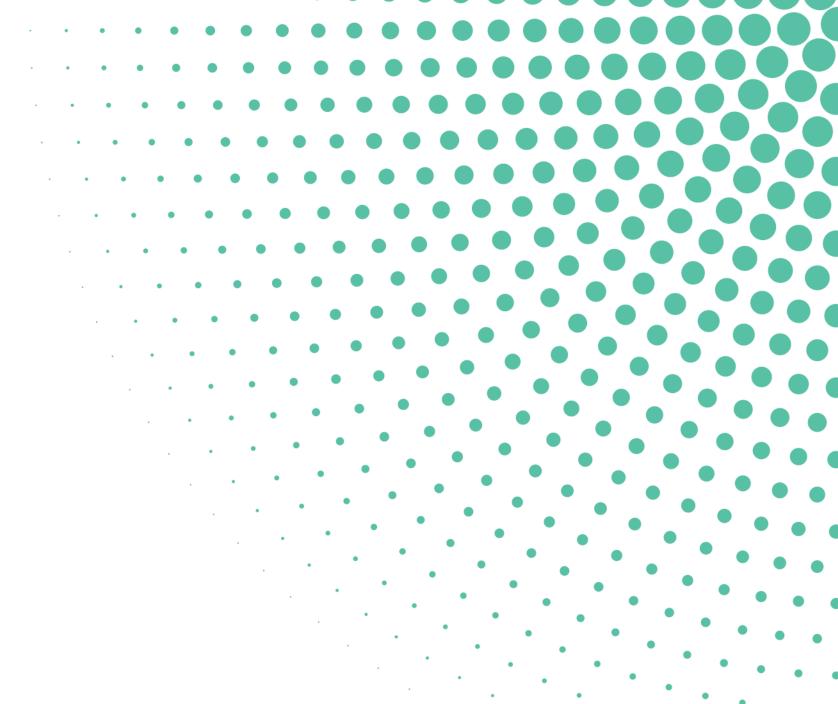
#### What does "in good faith" mean?

It means sharing a concern that you honestly believe may be a violation of our Code, policies, or the law, even if you are later proven to be mistaken. Note that any accusations that prove to be slanderous or made in bad faith may result in discipline.









## Integrity in our workplace









## We cherish diversity

We value the individual differences, experiences, and capabilities of each employee. Our diverse backgrounds and perspectives make Mozarc special.

We are strongly committed to a culture where everyone is treated with dignity and respect. Everyone has a role in creating our culture of equity, inclusion, and belonging.









## What respect and inclusivity look like

#### No discrimination

We will only make employmentrelated decisions based on the job requirements and an individual's qualifications. This includes decisions about hiring, retention, promotion, and compensation.

We provide reasonable accommodations for employees for their religious beliefs and practices, disabilities, pregnancy and childbirth, and medical conditions.

#### No harassment

We must foster an environment that is built on trust and respect. It must be free from any harassment.

A positive, respectful work environment gives everyone the opportunity to do their best work, without fear or intimidation. Each of us has an obligation to stop harassment.

#### No abusive behavior

We desire a culture where each employee feels safe and valued.

To build this culture, we also prohibit abusive conduct.

#### Tell Someone....

If you see, suspect, or experience discrimination, harassment, or abusive behavior, report it. Your manager, Human Resources and Legal & Compliance are here to help.







# We maintain a safe and healthy workplace

You are our most important resource.

Our success depends upon maintaining a healthy and safe working environment for all employees.









## How we foster safety and health

## Promoting environmental health and safety

The health and safety of our employees is a top priority at all our locations.

- Comply with all applicable environmental, health, and safety regulations, policies, and procedures that apply to your job.
- Understand any hazards in your work area.
- Immediately report any incidents, injuries, or unsafe working conditions.

#### Preventing workplace violence

We are committed to providing a safe and secure working environment. There is no place for physical intimidation, threats of violence, physical abuse, or weapons of any kind.

- Tell your local Human Resources representative about any activity or behavior that appears to be intimidating or violent.
- Report anything that threatens the security or safety of our employees.
- If there is imminent danger to you are someone else on Mozarc property, contact local law enforcement.

#### Prohibiting alcohol and drug use

Bring your best self to work.

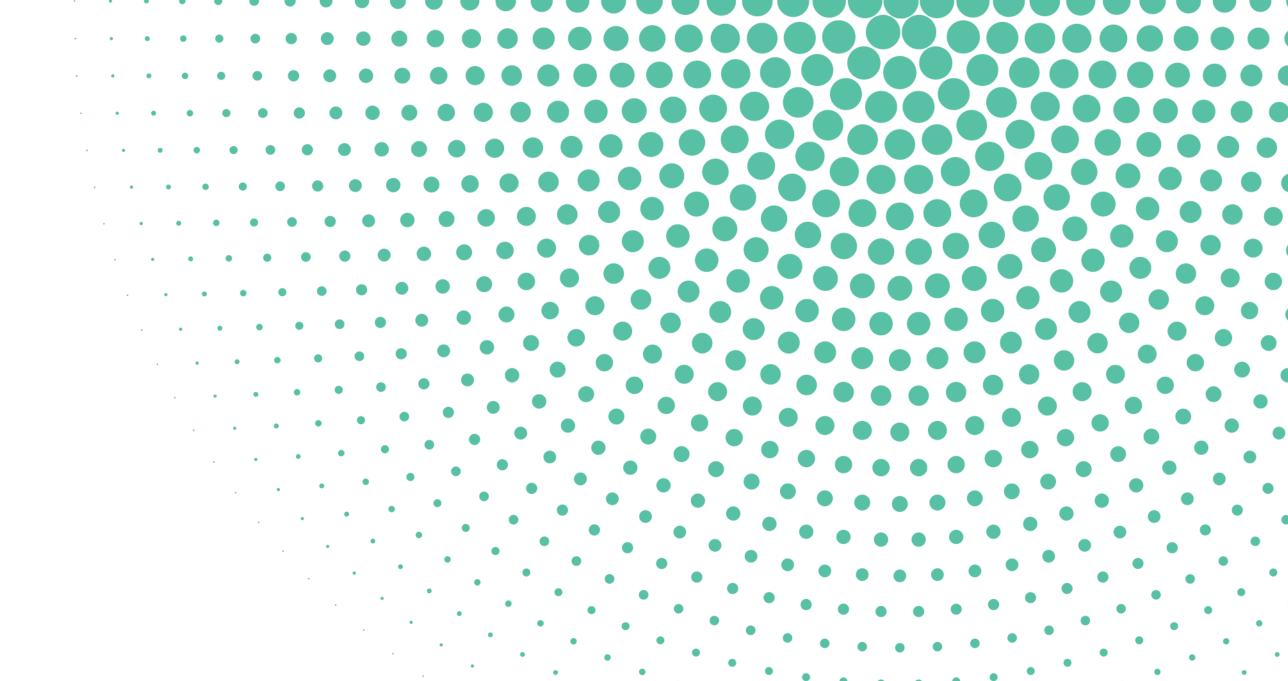
Drugs and alcohol can prevent you from doing your job safely. They can also jeopardize the safety of others. You should not perform your work under the influence of any substance. This includes alcohol and illegal drugs. It also includes prescription medications that are improperly used or that impair your ability to work safely.

No one may possess, use, sell, offer, or distribute illegal drugs or other controlled substances on our property.









# Integrity in our interactions with patients and customers









# We are committed to patient safety and quality

Every employee can – and must – contribute to a culture focused on patient safety and quality.

We must work with a sense of purpose and ownership.

Remember that there is a human life on the other side of every decision.









## How we put patients first

#### Customer and patient interactions

We have a responsibility to ensure that our interactions with healthcare providers and patients are ethical and beyond reproach.

• We will not improperly influence a healthcare professional, patient, or customer. This means that we will not offer or provide an improper payment or other benefit as a reward for prior or future business.

We have great respect for the relationship between patients and their healthcare professionals.

 Our work should never compromise the integrity of the patient-physician relationship.

#### Clinical research

We are committed to ensuring the safety, privacy, and well-being of the patients who volunteer in our clinical trials. Our clinical studies are designed and conducted based on these guidelines:

- Recognized medical and ethical standards
- Supplemental requirements imposed by a research site or institutional ethics committee
- Culture, laws, and regulations of the countries where we conduct our studies
- Accurate and transparent reporting, interpretation, and verification of our clinical data and results







## How we assure quality

#### We put quality first

- We put patients at the heart of all our decisions.
- We work each day with purpose, ensuring safe and effective renal care products for our patients and customers.
- We deliver on our commitments to regulatory authorities.
- We immediately raise quality issues to our manager or the appropriate Quality personnel.

#### We report quality and product concerns

Each of us is responsible for asking questions and voicing concerns related to quality and safety.

We also have the responsibility to report any product quality issues for the purpose of tracking product performance and taking appropriate corrective actions.

If you learn of a complaint associated with a Mozarc product or therapy, you have a responsibility to report it within 48 hours.

Not sure how to report a product complaint?

Visit the Integrity Matters page on the Mozarc Intranet site for more information.







## We promote our products fairly

We believe that healthcare providers have a right to fair and balanced information about our products. This includes knowing the associated benefits and risks.

We believe that they have a right to choose the product or therapy that best meets their patient's individual needs and disease state. We respect their decision, even if they do not choose our products.









## How we promote our products fairly

All materials about our products and therapies must be truthful, balanced, and supported by data and relevant experience. They must accurately communicate about efficacy, quality, safety, and price. We must only promote our products based on the approvals received in each country.

We prohibit all employees from promoting products in these situations:

- Promoting a product prior to its approval
- Promoting an approved product for a use that has not been approved by the appropriate regulatory authorities

#### Information about our competitors

We will provide only honest and truthful information.

We will not disparage or make untrue statements about our competitors' products or services.







### How we use social media

The internet provides unique opportunities to listen, learn, and engage with internal and external stakeholders. This can be done with a wide variety of tools, such as blogs, social networking sites, and chatrooms.

Our use of social media should be responsible, ethical, and appropriate.

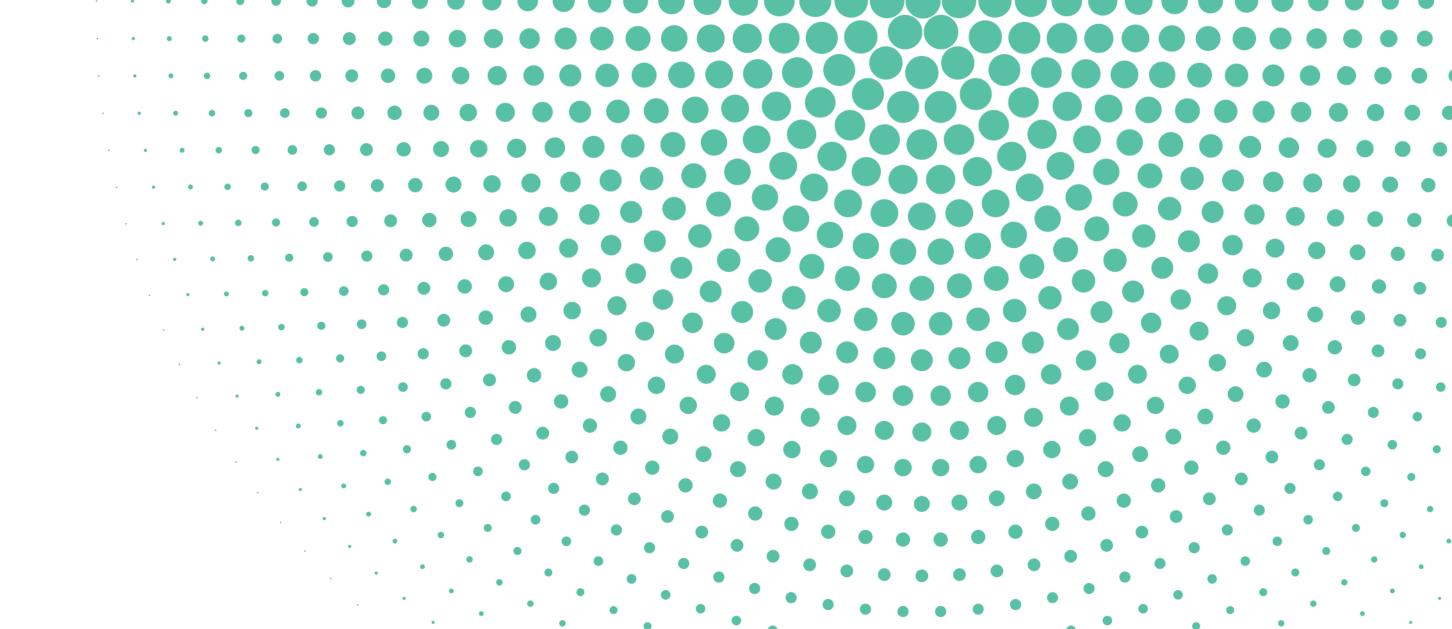
Social media is a public resource.

- Only non-confidential information about Mozarc may be posted.
- Always consider any information posted online as permanent even if you later delete or retract it.









## Integrity in our business conduct









## We compete fairly

We are committed to dealing fairly with thirdparties at all times.

We will not engage in any unethical or illegal conduct to gain an unfair business advantage against either competitors or customers.









### How we communicate

#### Communications with competitors

Do not discuss the following with competitors:

- Confidential information, including price, sales, marketing, inventory, production, supply costs, supply information, or research and development
- Terms in contracts with any customer, supplier, or vendor
- Bids, quotes, pricing proposals, or other communications with customers and government agencies
- Refusal or intent to refuse to deal with any customer, supplier, or vendor

#### Communications with customers or distributors

Do not communicate with customers or distributors about the following:

- Whether we would refuse to deal with a competitor of a customer or distributor
- Specific prices we charge a customer's or distributor's competitor

What should you do if a competitor attempts to engage you in discussions that would create an unfair business advantage? Stop the discussion immediately. Then report it to the Legal & Compliance department.







We do not engage in corruption and bribery

We are committed to integrity and honesty in all aspects of our business at all times.

We will not engage in any unethical or illegal conduct.









## How we oppose corruption and bribery

You may not offer or pay, directly or indirectly, anything of value to a third-party for any of these purposes:

- Improperly win or retain business
- Improperly influence individuals whose decisions could impact our business
- Gain an improper advantage in product approvals, sales, research, permitting, hiring, or any other aspect of our business
- Illegally influence the action of any patient, customer, supplier, or government official

Anything of value includes cash, gifts, business courtesies (travel, meals, and entertainment), donations, sponsorships, or other items that could be valuable to the recipient.







## How we oppose corruption and bribery

#### Anti-money laundering

Be alert and contact Legal & Compliance if a customer, distributor, or supplier makes any of the following requests:

- Request for payment in cash
- Request for payment from a non-business account
- Request for other unusual payment terms

#### Additional rules

- You may not accept anything of value that might affect your objectivity in doing your job.
- You may not make facilitation payments to government officials.
- You may not attempt to use a third-party to do something that we are prohibited from doing.

**Money laundering** is the process by which individuals or groups try to conceal the proceeds of illegal activities. Money laundering may also involve trying to make the sources of illegal funds look legitimate.

A facilitation payment is a payment made to a government official to speed up certain actions or services. (Examples: processing visas, permits, or licensing applications; or providing utilities such as phone service or water.)







## We avoid conflicts of interest

We avoid situations that could create distrust with our customers, patients, suppliers, or regulators. This includes situations that might do the following:

- Impair objectivity
- Cause or create a perception of favoritism to outside organizations or individuals
- Interfere with your ability to perform your job
- Create actual or potential harm to our business or brand









## How we handle third-party relationships

We value our distributors, suppliers, vendors, consultants, and other third-parties. We want to work with partners who share our values and who will meet our business needs.

If your job includes selecting business partners, follow these guidelines:

- Complete due diligence on potential partners.
- Have an appropriate business reason for selecting a particular third-party.
- Base every business decision on objective criteria.
- Disclose potential conflicts of interest.

#### Maintain integrity in our relationships

Before you accept a gift or an invitation from a third-party, know what is permitted. Obtain all necessary approvals in advance.







## Report any conflict of interest

If you become aware of a potential or actual conflict, you have an obligation to disclose it.

Here are some examples of conflicts of interest:

- · Giving or receiving anything of value to gain a business or personal advantage
- Having a financial interest in any company that competes, does business with, or seeks to do business with us
- Engaging in outside opportunities that could interfere with your work performance or create a conflict of interest
- Favoring a family member, romantic partner, or personal friend when making a business decision

If in doubt, disclose the relationship or activity.
Visit the Legal & Compliance page on the Mozarc Medical Intranet for more information.







# We deal honestly and fairly with government authorities

Our products are heavily regulated by government agencies around the world.

We are committed to open and professional relationships with regulators on matters of regulatory policy, submissions, compliance, and product performance.

We are all responsible for ensuring compliance.

If you have concerns about regulatory compliance, report these concerns immediately to your manager.









## Government audit and investigations

We cooperate and comply with valid government investigations and requests for information. We also cooperate with government officials who may inspect our facilities or investigate our activities. In all cases, we protect the legal rights of Mozarc and its employees.

#### Routine audits and inspections

We have teams that regularly interact with government officials. Those teams should follow their standard processes.

#### Non-routine inquiries

Contact your Legal & Compliance representative before submitting to any interviews, answering questions, producing documentation, or discussing compliance.

All documentation and communications with a government inquiry or other legal matter must be forwarded to the Legal & Compliance department immediately. This includes any notice of investigation, lawsuit, subpoend, or request for products or documents.







## We follow trade laws

We are a global company that engages in international trade every day.

We are committed to compliance with all applicable trade regulations.









### How we follow trade laws

Trade laws include the following:

- Export and import controls
- Sanctions by different governments that restrict business activities with certain countries, entities, or individuals
- Anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not approved or sanctioned by the U.S. government

Violations of these laws jeopardize our ability to serve customers and may subject us to substantial fines and penalties. We follow these guidelines when moving goods internationally:

- Keep accurate records
- Appropriately classify and value goods
- Pay the appropriate duty owed

If you are involved in the international movement of goods or services, you must comply with all laws and policies regarding international trade restrictions.

Note that if a U.S. law conflicts with a local trade law, the U.S. law may apply.

Always consult with our Legal & Compliance department for proper guidance in this area.







## We take ownership

Our business is highly regulated. Stakeholders inside and outside of Mozarc rely on the integrity of our business records.

Each of us owns the responsibility for:

- Managing and maintaining accurate business records
- Protecting personal and confidential information
- Safeguarding company assets and intellectual property









## How we manage business records

We must ensure all records are accurate, complete, and not misleading in any way.

Special care should be taken with the following records whether paper or electronic:

- Financial records
- Manufacturing and research records
- Records filed with or required by government agencies
- Time records and business expenses

Retaining appropriate records is necessary to run our business. However, the routine removal of records that are no longer needed improves our operations.

Follow these guidelines to ensure appropriate record management:

- Maintain records according to our records retention policy and schedule
- Retain all documents pertaining to pending or anticipated litigation, government audits, or investigations
- Retain all records that are held for legal purposes







## How we protect information

#### Personal information

Personal information is any information that can be used alone, or in combination with other information, to identify a specific individual.

Employees, patients, and healthcare providers provide us with their personal information. They trust us to handle it with care. They expect us to use it in accordance with the law and our stated privacy notices and policies.

#### Confidential business information

Confidential business information is information that is not generally known or readily available to others.

Disclosure of this confidential information outside of Mozarc could seriously damage our interests. We are all responsible for safeguarding this information.

We must also safeguard confidential information shared by our vendors, suppliers, and other business partners.

Limit access to authorized persons with a legitimate business need for the information. If you believe personal or confidential information has been inadvertently accessed or distributed, email <a href="mailto:privacy@mozarcmedical.com">privacy@mozarcmedical.com</a> immediately.







## How we protect our assets

#### Company assets

The assets we use to perform our work – our workplace, materials, equipment, and third-party service providers – are available for appropriate business purposes.

We have a responsibility to protect these assets from theft, loss, misuse, and waste.

#### Intellectual property

Our intellectual property is one of our most valuable assets. It includes patents, trade secrets, trademarks, copyrights, design rights, logos, know-how, photos/videos, individuals' names, and other intangible industry or commercial property.

We protect our intellectual property by obtaining patent, trademark, and trade-secret protections.

We also take precautions to prevent inappropriate disclosure, use, or loss of this information.







# We invest in our global communities

We aim to be a positive social presence in every community where we work.

We support these areas:

- Human rights and fair labor practices
- Political activity
- Environmental sustainability









## Our role in human rights and fair labor practices

We promote basic human rights by following applicable local labor laws.

We do not allow child or forced labor by our company, vendors, or suppliers.

We follow all applicable wage and hour laws. This includes rules about minimum wage, maximum hours, and overtime.







## Our support for political activity

We encourage support for reasonable public policy that advances our core values.

We also encourage employees to personally engage in the political process. This may include the following:

- Volunteering
- Making contributions to candidates or other causes based on your personal beliefs and values

Your personal political involvement must not be misrepresented as Mozarc's endorsement or association. Soliciting on behalf of a political party, candidate, or cause during work hours or on company property requires advance written approval from our CEO and Chief Legal Officer.







## Our role in environmental sustainability

We recognize the critical interdependency between human health and the environment. It is our responsibility to continually strive to improve the welfare of our employees, our communities, and our environment. That is why we commit to the following:

- Minimize our impact on the environment to protect employees and the communities where we operate.
- Follow all applicable environmental regulations.
- Work to continuously reduce any environmental impacts of operations and our products.
- Conserve energy and water, minimize waste and emissions, reduce greenhouse gas emissions, wherever feasible in our operations and our products.
- Promote sustainable product and packaging design.







Your efforts to follow our Code of Conduct help strengthen our mission, vision, and core values.

## Thank You!

Visit the Mozarc Policy Portal on the Mozarc intranet site for more information.





