

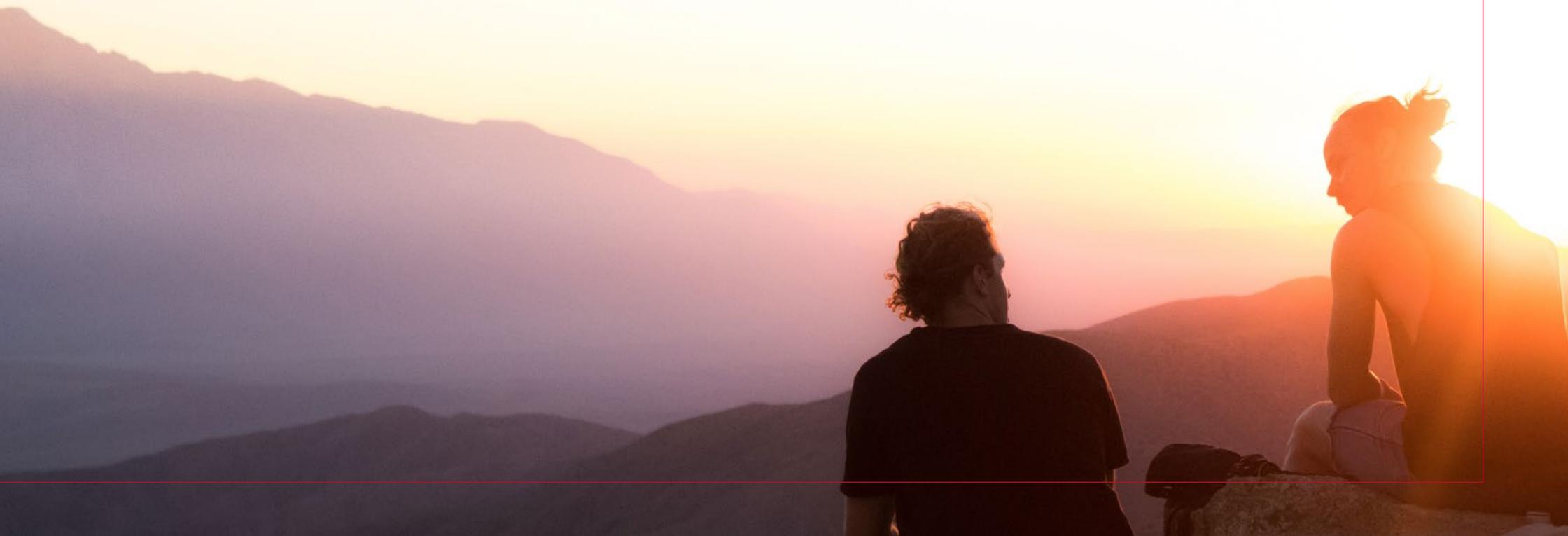
A black and white photograph of a hand holding a leaf. The hand is open, palm up, and the leaf is held gently between the fingers. The background is dark, making the hand and leaf stand out. The text 'Code of Conduct' is overlaid on the hand in a white, sans-serif font.

Code of Conduct

REVENIO

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A sustainable future requires uniform practices

Dear colleagues and partners,

Revenio is a leading company in the global market for ophthalmological devices and software solutions that operates in international markets, and its business is aimed at exerting a positive influence on individuals and society. The cornerstones of our business are safe and reliable products, and it is important for us to take sustainable development into account in our operations. Our key competitive advantages are knowledge and people, technology, brand, production, and strong financial position.

Revenio's operations are guided by the entire group's common quality criteria. Our corporate responsibility is based on our strategic guidelines and the value we create for our stakeholders, society, the environment, and the climate. In all our operations, we take into account the unique characteristics of the business and operating environment specific to the medical technology sector and support the UN Sustainable Development Goals.

A uniform operating culture plays a key role in us meeting our business goals and in building trust among our personnel, customers, partners, and other stakeholders. This trust can only be achieved through ethical business principles based on our values.

Our Code of Conduct is at the heart of our operations, as it defines our common guidelines and key principles, which guide us in our decision-making and daily work. The Code of Conduct outlines the rules by which all Revenio employees must abide, regardless of position or the geographical location of the office. Our Code of Conduct is aimed at supporting us in our decision-making in the global business environment.

We expect all our employees and partners to understand our Code of Conduct and to follow it in all circumstances. For our partners, we choose operators who share our ethical, social, and environmental values, and who follow good practices and standard requirements regarding human rights, labor, health, safety, and environmental protection. Sustainable business is the responsibility of everyone.

We act in an increasingly global environment, and our responsibility is global in nature as well. At Revenio, we want to create a transparent and sustainable culture built on trust, and we expect both Revenio's employees and our stakeholders to commit to upholding it. Our Code of Conduct is an important tool in this work. It supports us in creating a sustainable future together.

Jouni Toijala CEO, Revenio Group



Our values



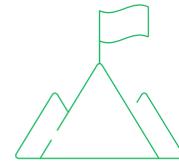
Trust &
Integrity



People &
Teamwork



Innovation &
Quality



Growth &
Value creation



Ethical conduct is everyone's responsibility

Everyone at Revenio carries a shared responsibility for our reputation and our brand, and for ensuring that no one can question our integrity.

"We recognize the United Nations Sustainable Development Goals."

Each Revenio employee should

1. Familiarize themselves with the Code of Conduct.
2. Act in accordance with the Code of Conduct and to comply with it.
3. Request additional information or support from supervisors when in doubt about the best course of action. Ask before you act.
4. Speak up and report concerns and observed violations of Code of Conduct to supervisors or via our dedicated reporting channels.

Revenio management is expected to

1. Communicate the Code of Conduct and corporate policies to their teams.
2. Set a good example.
3. Create an open and transparent atmosphere, where the team members can raise also their concerns.
4. Handle any reported misconduct [to HR or Internal Audit Committee] as quickly as possible, confidentially and impartially.

When making decisions

1. Ask yourself if the planned action is in line with Code of Conduct? Is it legal? Or ethical?
2. Could my actions potentially harm the company or its' reputation?



We comply with the local laws

As a globally operating medical technology company, the compliance with local laws and regulations is unconditional. We consistently comply with the law in all our activities and will never advise anyone to violate applicable local laws and regulations.

We expect that our employees are familiar with the laws and regulations applicable to their working tasks and areas of responsibility. Supervisors are required to ensure that the relevant regulations are accessible and at hand for their teams.

The most significant laws for us are those concerning product safety, consumer and competition protection, the equality, prevention of bribery and corruption, occupational safety and environmental protection.

As a stock exchange listed company, Revenio strictly complies with securities market regulations and regulations and guidelines for good corporate governance. All employees should familiarize themselves with the Insider Rules as well in the company Intranet.

"As a globally operating medical technology company, we comply with the local laws."



Key principles

We comply with the law



We respect human rights



We do not use child labor



We respect freedom of engagement



We promote equal opportunities,
diversity and non-discrimination



We provide a safe and healthy working
environment



We do not tolerate any
form of harassment

We are committed to patient and
product safety



We are committed in ethical R&D



We give truthful product information



We manage our operations in an
environmentally responsible manner



Zero tolerance to bribery in any form



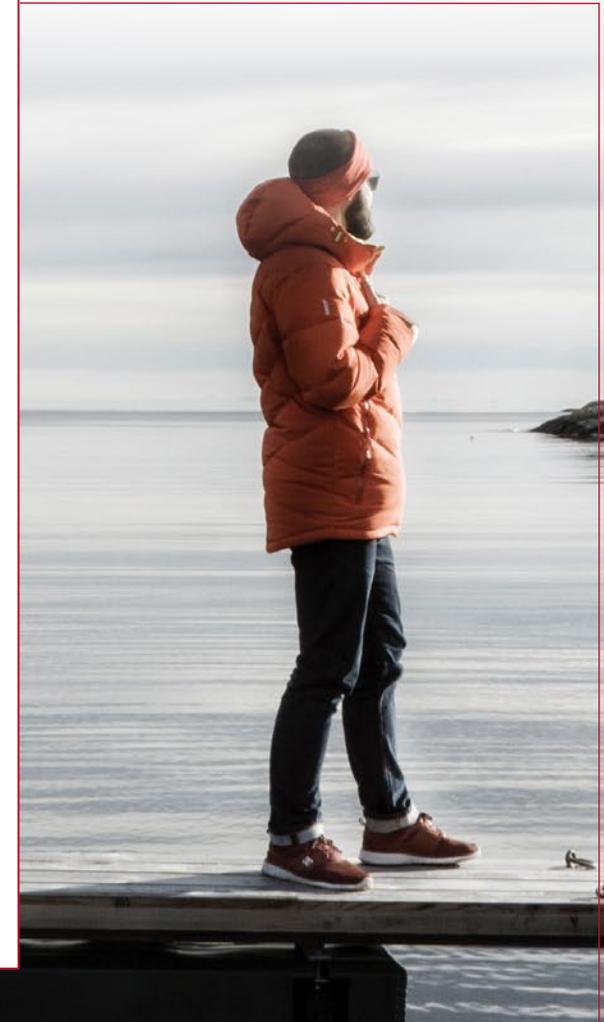
We avoid conflict of interest



We support open and effective
competition



We protect our intellectual property
and company assets





People and human rights

"As an employer, Revenio supports the basic labor rights stated by the International Labor Organization (ILO)"



We respect human rights

We support and respect the protection of internationally proclaimed human rights as expressed in the United Nations Declaration of Human Rights and we are committed to the related Guiding Principles on Business and Human Rights.

As an employer, Revenio supports the basic labor rights stated by the International Labor Organization (ILO): freedom of association, effective recognition of the right to collective bargaining, abolition of forced labor, and equality of opportunity and treatment. All employees enter into employment with the company of their own free will; we will not support any form of forced or compulsory labor.

We ensure that wages paid meet the legal or industry standards and are always sufficient to meet the basic needs of personnel and to provide some discretionary income.

We do not use child labor

We ensure that minors are properly protected; and as a fundamental principle, we will not employ children or support the use of child labor, except as part of government-approved youth training schemes. We do not engage subcontractors or suppliers that use child labor.

We respect freedom of engagement

We facilitate regular consultation with all employees to address areas of concern.

We respect the right of all personnel to form and join trade unions of their choice and to bargain collectively. In any case of major layoffs, social benefits and guidance plan is in place.



We promote equal opportunities, diversity and non-discrimination

We appreciate diversity and do not discriminate on the grounds of gender, age, race, religion or beliefs, ethnic or national origin, marital/civil partnership status, sexuality, disability, union membership, or political affiliation.

We follow local laws and offer equality of opportunity to all employees. We do not engage in or support discrimination in hiring, compensation, access to training, promotion, termination or retirement. We assess individuals based on their competence, skills and merits.

We provide a safe and healthy working environment

We provide a safe and healthy working environment at all sites and facilities and take adequate steps to prevent accidents and injury to health. We comply with applicable laws and industry standards on working hours.

Our goal is zero hazards. We also expect our employees to take responsibility for their own safety and the safety of their co-workers, and report all incidents, near miss cases, or health and safety risks.

We do not tolerate any form of harassment

We are all entitled to good, courteous and respectful treatment by our supervisors and colleagues. Mutual trust and respect are at the core of Revenio's corporate values.

We do not accept bullying, discrimination and other forms of in-appropriate behavior. We do not allow behavior, including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.



Product safety and quality

We are committed to patient and product safety

We are committed to providing products that are safe and reliable, and of high quality.

We strive to actively recognize the users' needs and develop new innovations.

We always strive to deliver the quality we have promised. We are committed to the continuous improvement of the quality and safety of our products.

Every Revenio employee involved in the R&D, supply chain, quality assurance and marketing of our products carries responsibility for the safety of our products.

We are committed in ethical R&D

We develop and provide efficacious and safe products for the best of the patient. Every step of the research and development process is conducted in compliance with the internationally adopted regulatory standards and criteria, which every employee involved in the company's R&D activities must obey.



"We develop and provide efficacious and safe products for the best of the patient."

The study designs and research protocols are evaluated and approved in accordance with the legal requirements. Data from clinical studies is recorded, handled and saved confidentially and in a manner allowing correct and transparent reporting and disclosure of the study results. The results are published in a truthful manner.

We give truthful product information

When promoting our products, we provide information truthfully, refraining from misleading expressions. All information should be based on approved product descriptions and scientific publications.

We manage our operations in an environmentally responsible manner

We are committed to managing our operations in an environmentally responsible manner. We focus on continuously reducing our environmental impact. We comply with environmental laws and regulations, and we expect our suppliers to do the same.

We also expect our suppliers to continuously strive to reduce waste from transportation, inventory, motion, waiting, over-production, over-processing and defects.



Business ethics

We uphold the highest standards in business ethics and integrity. We support efforts of national and international authorities to establish and enforce high ethical standards for all businesses.

We respect local cultures, customs, and the values wherever we operate.

We have zero tolerance towards all forms of bribery

Bribery – giving or receiving money or any other benefit in order to impact decision-making in favor of the company – is forbidden in any form.

We do not offer or accept bribes. We do not promise or pay bribes or illegal payments to authorities or other parties or incite or advise anyone to offer or accept them. We do not do business with suppliers or partners who do not fully comply with anti-bribery laws and regulations.

We comply with guidelines issued by public authorities in each country and consider the local cultural aspects. We never accept a gift in the course of contract negotiations with suppliers. We always pay for our own travel and accommodation expenses, even if the travel arrangements are made by a supplier or cooperation partner.

Do not give, offer or accept any valuable advantage when dealing with public institutions and authorities. Persons representing public institutions, authorities, healthcare professionals, healthcare and other service providers and suppliers, among others, are typically considered potential objects of bribery. When promoting our medical products, we act in accordance with national and international codes of practice concerning promotion of medical products.



"We respect local cultures, customs, and the values wherever we operate."

How to know if it is a gift or a bribe?

The gift or hospitality is of minor value.

There should be no obligations for either party or expectations of anything in return.

- What is the distinction between a gift and a bribe in different cultures?
- How the gift would be understood by an outsider?
- Gift it is something you can talk about openly; a bribe is not.

Charity, sponsorship and donations

Decisions regarding funds available for donations are made by the company CEO. We do not make payments or donations to political parties or individual politicians. We do not sponsor activities that conflict with our values and principles of sustainable development or ideological organizations that are controversial.

We shall not approve, support or facilitate any form of money laundering.

We avoid conflict of interest

We conduct all business transactions in favor of the interests of Revenio and avoid situations where personal interest conflicts with Revenio's interests. We refuse to arrange any form of personal benefit to anyone.

There is a conflict of interest when personal interests or relationships influence my decision-making or interfere with Revenio's interests. When in doubt, or when someone else could perceive the situation in that way, discuss the matter with your supervisor.

We do not promote our personal interest at work. Our personal ties do not affect our decisions. When making decisions, company's interest determines our choice. If you are partial in making the decision, contact your supervisor.

We support open and effective competition

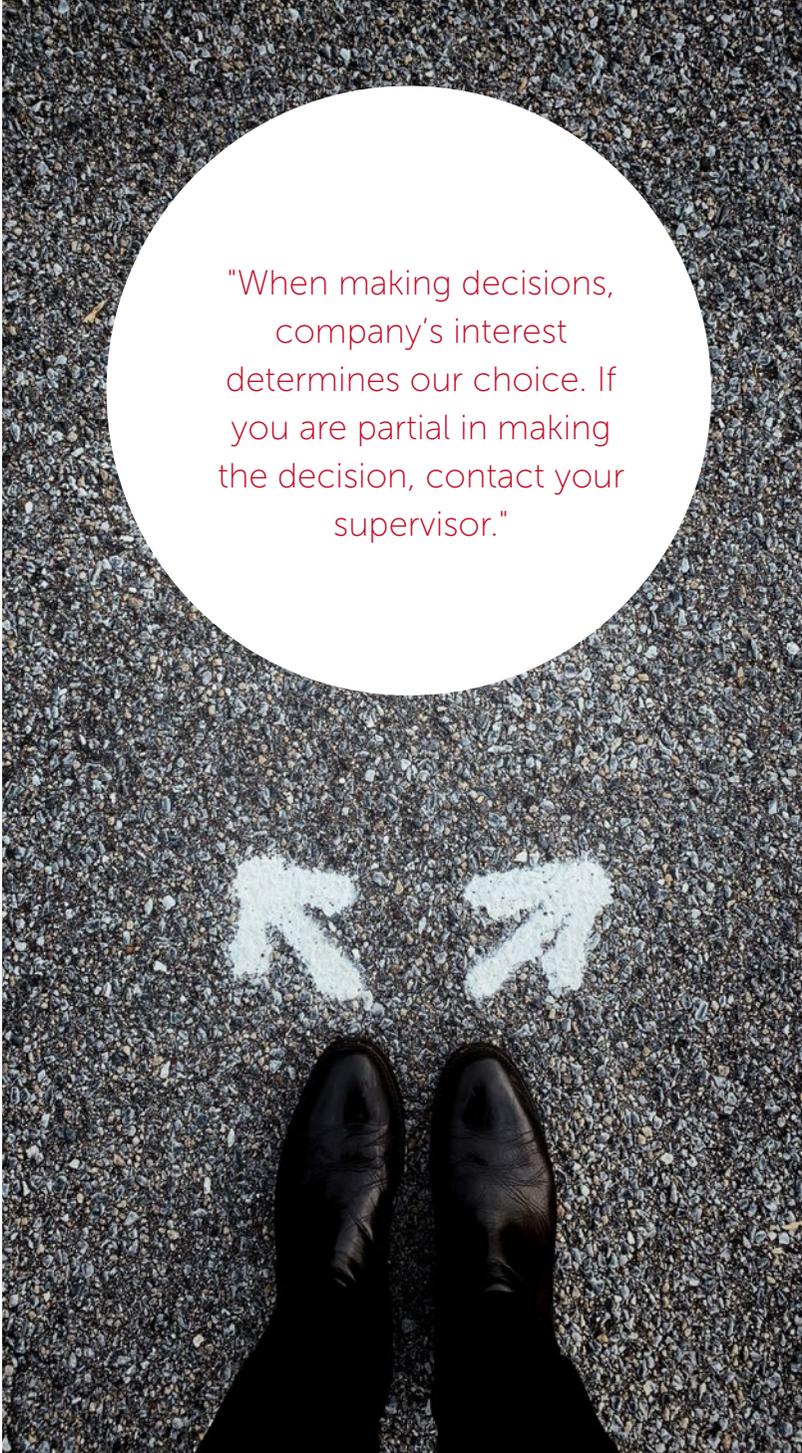
We are committed to compliance with applicable competition law in all our activities, and do not take any part in activities that might restrict or impede effective competition. We do not agree or discuss prices, customers or other business secrets with competitors or other external parties.

To ensure legal compliance, always contact your supervisor before entering into agreements or taking coordinated action with customers or partners.

We select our supplier and other business partners carefully. When selecting a supplier or other business partners, we always ensure that the candidate complies with local legislation, including legislation concerning health, safety, environment and the prohibition of use of child labor.

When importing and exporting goods, we acquire all the required licenses and permits. The Customs is provided with exact and truthful data.

We do not engage in any commercial agreements that include conditions against competition legislation.



"When making decisions, company's interest determines our choice. If you are partial in making the decision, contact your supervisor."



"We are all responsible for protecting information from any misuse, violation, loss or theft."

We protect our intellectual property and company assets

Revenio is a listed company, and we are obliged to consider insider regulations and confidential business secrets which we may not disclose, as well as our disclosure policy. The same principles apply also in social media.

We are all responsible for protecting Revenio's assets, including information systems and intellectual property rights, such as patented proprietary methods and knowhow, trademarks, brands and logos. This also applies to the protection of personal data as we in many cases handle also our customers' and other stakeholders' data of confidential nature.

All confidential information shall be [kept and] destroyed with care and in accordance with all applicable laws and regulations.

We expect our employees to respect and protect Revenio's intellectual property by conforming to all applicable laws, regulations and international treaties. We also respect the intellectual property held by other parties and do not try to obtain it by illegal means.

As a rule, you are not allowed to use Revenio's assets or products and services for gaining personal advantage.

We want to safeguard intellectual property rights arising from the research activity as comprehensively as possible. In collaboration projects, collaboration partners are required to respect each other's interests and share information in an atmosphere of mutual trust and confidentiality.

Confidential information

We are all responsible for protecting information from any misuse, violation, loss or theft.

We maintain the secrecy of confidential information and ensure that it is not lost or passed on to third parties. We use information systems in compliance with relevant agreements and access rights. We do not leave documents containing confidential information in view.

We comply with laws and regulations in protecting personal data and privacy

We only collect information which is relevant for the purpose of the data file. We ensure the accuracy of data on file and ensure that their processing does not jeopardize the privacy of individuals on file. We inform the individuals on file of the file's existence and their right to review the data on themselves.



Voice your concerns

Reporting concerns and misconduct

It is important that each employee reports suspected misconduct. This enables us to prevent or correct any misconduct.

Primarily, you are encouraged to contact a supervisor in your organization. If you feel that you are unable to share your information openly, we provide you with an opportunity to anonymously [and in your native language] express your concern via web-based whistleblowing channel managed by an external partner, WhistleB.

The anonymous reporting channel operated by [WhistleB](#).

Any breaches of Code of Conduct or other corporate guidelines or policies will be investigated. Based on findings, appropriate corrective or preventive measures will be taken. There will be no measures taken against a person who has submitted a notification. Neither are countermeasures tolerated from any other person or group. All whistleblowing notifications received from employees are handled confidentially.



REVENIO

ENABLING EASY & EFFICIENT DIAGNOSIS

WWW.REVENIOGROUP.FI