

GCX CODE OF BUSINESS CONDUCT & ETHICS

As part of our corporate mission, GCX Healthcare Solutions (“GCX”) is committed to the highest standards of ethical business conduct. This GCX Code of Business Conduct & Ethics (the “Code”), summarizes GCX’s compliance and ethical policies for all employees. For the purposes of this Code, all GCX Board Members, Company Officers, independent contractors and employees are considered “Employees”. The Code is intended to define GCX’s expectations for how Employees should conduct day to day business, help drive decision making, and create a culture of compliance. GCX expects all Employees to read and become familiar with the policies and expectations described within this Code.

COMPLIANCE WITH ALL LAWS, REGULATIONS AND COMPANY POLICIES

GCX will comply with all applicable laws and regulations and is committed to:

- Maintaining a safe and healthy work environment,
- Promoting a workplace that is free from any form of discrimination or harassment,
- Prohibiting and preventing any retaliation, threat, demotion, discharge, or any other adverse action against any person who acts in good faith in reporting any violation of this Code or other GCX policy,
- Complying with all applicable medical device regulations and standards to produce safe and effective medical devices
- Complying with all applicable legal and regulatory requirements,
- Supporting fair competition and trade compliance laws and regulations, including all applicable global export, import and sanctions,
- Prohibiting any illegal payments, gifts, or gratuities to any customer, government official or political party,
- Prohibiting the unauthorized use of any trade secrets, confidential or copyrighted information,
- Protecting the privacy rights of Employees, customers and their patients and
- Complying with all applicable environmental laws.

While this Code is not intended to be a comprehensive guide to all of GCX’s legal responsibilities, all GCX Employees are expected to be familiar with the laws, regulations and company policies within their respective area. Violations of applicable law, regulations or this Code or other business policies may lead to disciplinary action, including dismissal.

ETHICAL CONDUCT

All GCX Employees are required to deal ethically, fairly and honestly with coworkers, customers, competitors, distributors, government officials, suppliers or other third parties. Serving patients, healthcare professionals and medical institutions effectively is one of our most important goals. While conducting business we:

- Prohibit accepting or providing bribes, kickbacks or any other form of improper payment,
- Prohibit all gifts or favors to any customer, government official or supplier,
- Require clear and precise communication in our advertising and other public statements without any misleading information,

- Ensure accuracy on all invoices to customers of the sale price and terms of sale for products sold or services rendered,
- Protect all proprietary data provided by our customers, distributors or suppliers per our agreements with them or as required by law, and
- Prohibit GCX Employees from taking unfair advantage of our customers, distributors or suppliers through the manipulation of information or any other unfair dealing practice.

CONFLICTS OF INTEREST

A conflict of interest occurs when a relationship or activity could influence your judgment to perform your job duties objectively. Even the appearance or perception of a conflict of interest can place GCX at risk. We should never allow personal gain to prevent us from doing what is right. All GCX Employees must avoid conflicts of interest at all times and ensure no business decision is made based upon anything other than GCX's best interests.

In order to prevent conflicts of interest from occurring, GCX prohibits the following activities without first disclosing to the company and given specific written approval that a conflict does not exist:

- Maintaining an ownership, financial, or other interest in a competitor of GCX, or otherwise stands to benefit from the success of a competitor of GCX;
- Maintaining an ownership, financial, or other interest in a GCX vendor or otherwise stands to benefit from the success of a GCX vendor;
- Maintaining an ownership, financial, or other interest in a GCX customer or otherwise stands to benefit from the success of a GCX customer;
- Maintaining an intimate or romantic relationship with a direct or indirect subordinate; and
- Standing to benefit personally (in the form of "kickbacks," gifts or otherwise) from any transaction involving GCX.

CONFIDENTIALITY AND CORPORATE ASSETS

GCX Employees may be entrusted with confidential information from within the company or business partners. This information may include:

- information about current and future products or services,
- business or marketing plans or projections,
- earnings and other internal financial data,
- personnel information,
- supply and customer lists,
- protected health information, and
- other non-public information that that may be harmful to GCX customers, distributors or suppliers if disclosed.

This information is the property of GCX or the property of our customers or business partners. Unless given explicit instruction to do so, employees should not disclose any confidential information to a third party, especially when dealing with the press. All GCX Employees are required to sign an Employee Invention and Confidentiality Agreement that contains specific requirements to protect confidential information and trade secrets upon employment.

GCX assets also include email, instant message, intranet, authorized social media accounts, voicemail services and other electronic records. All company business must be conducted using company email and not a personal email account.

TRUE AND ACCURATE RECORD KEEPING

Various laws and regulations require GCX Employees to be honest and accurate in our records. Throughout all aspects of our business, GCX employees are required to keep true and accurate records that maintain the integrity of our financial and regulatory compliance.

USE OF COMPANY PROPERTY

In the absence of prior Company approval, assets of GCX should be used only for legitimate business purposes. All GCX Employees have an obligation to use GCX property efficiently and to report any theft or damage to appropriate GCX management.

MANAGER RESPONSIBILITY

If you manage other employees, you have a special and important responsibility to set an example and act in a manner consistent with this Code. These responsibilities include:

- Act as a role model, demonstrating ethical behavior in the performance of your duties,
- Make fair and objective business-based decisions,
- Review the Code as needed with your employees
- Ensure employees are aware of, and properly trained on, the relevant laws, regulations and Company policies that govern the business activities that they are engaged in on behalf of the Company,
- Create an environment where employees are comfortable speaking up without fear of retaliation,
- Take seriously any concern raised by an employee that compromises our Code, and take time to understand if the issue should be escalated, and escalate issues as needed,
- Take action when employees violate the Code,
- Fully support any compliance investigation, and
- Recognize and reward ethical behavior.

QUESTIONS AND GUIDANCE ON THE CODE AND OTHER GCX POLICIES

GCX has processes in place to help you follow this Code, company policies and the law. The General Counsel can field any question on the Code in writing at: reporting@gcx.com. Additionally, the following employees and departments can help answer questions in their respective areas:

- Your manager and department leadership can answer questions for policies that apply to your respective duties.
- Your manager or Human Resources can assist you with any question on the appearance of conflicts of interest
- Finance can answer questions related to financial, company controls and accounting matters.
- Humans Resources can answer questions about employment, benefits and workplace issues.
- IT can answer questions regarding infrastructure cybersecurity.
- The General Counsel can assist you with any question you may have interpreting the law.
- Quality Assurance can answer questions regarding the quality and regulatory compliance of our products.

REPORTING VIOLATIONS

GCX attempts to foster an environment in which ethical issues or concerns may be raised and discussed with supervisors or management without fear of retribution. All employees have an obligation to be vigilant for events that indicate unethical or illegal conduct. **GCX will not allow any retaliation, harassment, threat, demotion, discharge, or any other adverse action against any person who acts in good faith in reporting any violation of this Code.**

Should you have a concern or question that you do not feel comfortable discussing directly with your supervisor, Human Resources or the Compliance Officer. Unless you explicitly direct otherwise while reporting, all reports received will be kept anonymous to the fullest extent possible. Reports will be reviewed and investigated by management independent from the subject of the report. You may file a report via FaceUp at the following link or QR code:



- <https://faceup.com/c/ooseigux>

All reports, regardless of origin, will be taken seriously and reviewed promptly, discreetly, and professionally. GCX will review all reported violations and will determine appropriate response, including investigation, corrective action, and preventative measures. GCX will involve the Chief Executive Officer or Board of Directors when required. All reports, investigations and follow-up actions will be treated confidentially to the fullest extent possible.

AMENDMENT

GCX is committed to continuously reviewing and updating our policies and procedures. Therefore, this Code is subject to modification at any time.