

MBC CODE OF CONDUCT

Policy and Procedures



Message from the CEO

At Max Biocare, we are committed to helping people live happier and healthier lives. We are committed to providing health solutions in the form of scientifically validated natural medicines. We share a set of core values - **honesty, integrity** and **respect** for people. By making a commitment to these in our working lives, each of us plays our part in protecting and enhancing the company's reputation.

This Code of Conduct for Max Biocare (inclusive of all subsidiary companies collectively referred to in this Policy as MBC) sets out the principles, practices and standards of personal conduct expected of everyone who works for MBC.

Our Code of Conduct should be adopted in all business activities, and it should be used as a guide to determine what we do and how we do it. As a minimum, MBC complies with all applicable laws in the jurisdiction in which it is operating.

The Code comprises principles that apply to various aspects of our working environment, including how we interact with colleagues, and how we engage third parties to perform work for us or to represent us.

Working Together

- **Health, Safety and Environment:** We know that a safe and healthy working environment for all MBC personnel working at MBC is crucial to the continuing success of our business.
- **Employment Equality:** We are committed to providing equal opportunities in all aspects of employment.
- **Harassment and Bullying:** We are committed to a safe and fair working environment, which is free from offensive, humiliating or intimidating behaviour.

Ethical Business Practices

- **Bribery and Corruption:** We conduct our business activities with integrity. We do not participate in bribery or corruption in any form, whether direct or indirect, in either the private or public sector.
- **Gifts and Entertainment:** We do not give or receive gifts or entertainment which goes beyond common courtesies or which could be perceived as compromising a person's objectivity.
- **Conflicts of Interest:** We ensure that our personal interests do not conflict with the interests of MBC.
- **Insider Trading:** We do not use material information that is not generally available to the public for the purposes of share trading.
- **Anti-Competitive Conduct:** We promote fair and open competition in the markets in which we operate.

Use of Assets & Resources

- **Use and Protection of Personal Information:** We treat all personal information as confidential.
- **Financial Controls and Record Keeping:** We maintain appropriate financial controls to ensure the integrity of our accounts, keep records, and adopt reporting practices that are correct and complete.
- **Protection of Assets:** We protect the assets of MBC and ensure that they are used properly and for legitimate business purposes only.
- **Use of Technology:** We use our IT systems responsibly.

Engagement of Third Parties

- **Relationships with Third Parties:** We act with integrity, transparency, respect and professionalism in all our dealings with third parties, to promote mutually beneficial relationships.
- **Media and Public Disclosures:** We communicate honestly, accurately and in a timely manner.
- **Sponsorship and Donations:** We support charities and community groups through ethical sponsorships and donations.



This Code is supported by the **Code of Conduct Charter**, which provides an explanation of and practical implications for what we must do and what we must not do, with examples to illustrate how the principles can apply in specific situations.

Nguyen Pham
CEO, Max Biocare

1. Code of Conduct Policy

1.1

Who is our Code of Conduct for?

This Code applies to every MBC employee (full-time/part-time/casual), directors and officers. Independent contractors and consultants who are agents of or working on behalf of MBC (through outsourcing of services, processes or any business activity), are required to act consistently with this Code as it applies to their dealings with MBC staff.

Where a MBC company has formally been designated the operator of a joint venture, this Code should apply to the operations of the joint venture.

1.2

How can the Code of Conduct help you?

This Code of Conduct includes practical advice about laws and regulations, expectations and guidance. It also provides further information to help you use your own good judgement.

1.3

Our Core Values and Business Principles

Our shared core values underpin all the work we do and the foundation of our Code of Conduct. This Code of Conduct describes the behaviour MBC expects of you and what you can expect of MBC.

We are judged by how we act. Our reputation will be upheld if we act in accordance with the law and our Code. We encourage our business partners to live by the Code of Conduct or by equivalent principles.

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At MBC, we share a set of core values - Honesty, Integrity and Respect for people.

By making a commitment to these core values, each of us plays our part in protecting and enhancing MBC's reputation.

1.4

Why do we need a Code of Conduct?

This Code of Conduct is required to describe the behaviour expected of our employees and how they relate to our Business Principles and Core Values.

Whatever your role is with MBC, we expect your commitment in following this Code in the work you do every day.



2. Your Responsibilities

This section outlines your responsibilities and offers a guide to ethical decision-making.

2.1

Individual Responsibilities

Do The Right Thing

The Code of Conduct is for you. It sets the boundaries within which all MBC staff must operate every day, without exception.

You are expected to:

- Understand the risks in your role and how to manage them
- Seek advice when things are not clear
- Promptly complete the ethics and compliance training assigned to you
- Make sure that any third-party contractors, agents or consultants you work with are aware that we are bound by our Code and that they should act accordingly
- Speak up. It is your duty to report any suspected violations of the Code

What happens if I violate the Code?

Violations of the Code, and the relevant policies, can result in disciplinary action, up to and including dismissal. In some cases, MBC may report a violation to the relevant authorities, which could also lead to legal action, fines or imprisonment.

2.2

Your Integrity Check

To ensure compliance to this Code when dealing with work-related situation and issues which require decision-making, you and your team should consider Integrity checks below.

- Make sure your decisions or actions are in line with this Code of Conduct
- You should always act with integrity
- Understand the risk and possible implications of your actions, considering any potential impact it might have on MBC's reputation
- If necessary, seek advice from your manager and/or the MBC Ethics & Compliance Committee to help you make an informed decision

2.3

Seek Advice and Speak Up

If you would like advice on any matter relating to this Code or wish to report a concern, speak to your manager and/or MBC Ethics & Compliance Committee.

If you know or suspect someone is violating the Code, you have a duty to report it. Reporting a concern gives MBC the opportunity to detect a potential violation of our Code. Failure to do so might put MBC's reputation at risk.

MBC will not tolerate any form of retaliation directed against anyone who raises a concern in good faith about a possible violation of the Code. In fact, any act or threat of retaliation against MBC staff will be treated as a serious violation of our Code.

2.4

Manager's Responsibilities

We expect our managers to promote our ethical standards. They must and should always comply with this Code. They should show leadership in following our Code and maintain a culture of commitment to ethics and compliance.

As a Manager, you must:

- Understand and follow this Code at all times
- Be aware of the violation risks and the procedures to mitigate them. Decide on proper course of action in response to any violation
- Ensure your staff has completed Ethics and Compliance training assigned to them in a timely manner
- Ensure your staff understand the procedures they should follow to avoid violating the Code, including recording gifts and hospitality and potential conflicts of interest in the Code
- Encourage your team members to report if they know or suspect a violation
- If you are told of a possible violation of the Code, you have a duty to report it. You may refer it to the MBC Ethics & Compliance Committee. All reported concerns should be documented properly and be kept confidential. Never take it upon yourself to investigate the matter

3. Our Behaviour, People & Culture

This section sets out the standards of good behaviour that we expect from you - and that you have the right to expect from your colleagues.

3.1

Health, Safety, Security, Environment and Social Performance

MBC is committed to minimising the risks and maximising the benefits of all our products through innovation, compliance to high-quality scientific and ethical standards.

We are committed to ensuring our products are safe and of the highest quality for our consumers. We strive to ensure our products meet all applicable consumer protection and other relevant regulatory requirements.

We also strive to ensure all materials we publish are truthful, accurate and do not create a false or misleading impression.

We aim to earn the confidence of our customers and shareholders, as well as contribute to the communities in which we operate as good neighbours, creating lasting social benefits.

Your responsibilities

- You must ensure that appropriate informed consent procedures are followed when conducting clinical research
- You must ensure that the provisions of this Code and MBC's policy relating to the protection of personal data are applied when collecting or accessing any health information
- You can only provide information about our products if you are authorised to do so. This includes communications about our products on the internet or in other electronic media
- You can only promote our products in an ethical, fair and balanced way
- You can only use promotional materials and other product information that have been approved through our internal review procedures
- You can only publish information about our products in line with Company standards and procedures

You must follow the three
Golden Rules

Intervene
in unsafe or
non-compliant
situation

**Respect our
neighbours**

Comply with the
law, procedures and
international standards of
good practice, set out by
the TGA/ICH/FDA

3.2

Human Rights

Conducting our activities in a way that respects human rights is a business imperative for MBC and supports our licence to operate. Human rights requirements are embedded in our existing framework, and policies including:

- **Social Performance.** All major projects and facilities must have a social performance plan and address the social impacts of our operations on local communities
- **Security.** Company-wide security requirements help keep staff, contractors and facilities safe in a way that respects human rights and the security of local communities
- **Human Resources.** Our policies and standards help us establish fair labour practices and a positive work environment
- **Contracting and Procurement.** We seek to work with contractors and suppliers who contribute to sustainable development and are economically, environmentally and socially responsible

We comply with applicable laws and regulations, including the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organisation. We also regularly engage with our external stakeholders and always strive to contribute, both directly and indirectly, to the general wellbeing of the communities in which we operate.

Your responsibilities

- You must ensure that your work complies with MBC's commitments to human rights in Social Performance, Security, Human Resources, Contracting and Procurement
- If you know of or suspect any potential human rights violations relating to our business, it is your duty to report it to your manager and/or MBC Ethics & Compliance Committee

3.3

Harassment

MBC will not tolerate any form of harassment. We will not tolerate any action, conduct or behaviour which is humiliating, intimidating or hostile. Treat others with respect and avoid situations that may be perceived as inappropriate.

Feedback and criticism must always be delivered in an appropriate and respectful manner. In particular, be aware of cultural sensitivities - what is acceptable in one culture may not be in another. It is important to be aware of and understand these differences.

Your responsibilities

- You must always treat others with respect
- You must not physically or verbally intimidate or humiliate others with inappropriate jokes or comments
- You must not display offensive or disrespectful material. If you find someone being hostile, intimidating, humiliating or disrespectful, you should notify your manager and/or MBC Ethics & Compliance Committee

3.4

Equal Opportunity

At MBC, we offer equal opportunities to everyone. This helps us ensure we always draw on the widest possible talent pool and attract the very best people. We rely on everyone at MBC to continue our record on equal opportunity.

Your responsibilities

- When making employment decisions such as hiring, evaluation, promotion, training, development, discipline, compensation and termination, you must base them solely on objective factors, including merit, qualifications, performance and business considerations
- You should understand the value of diversity and must not discriminate in any way based on race, colour, religion, age, gender, sexual orientation, gender identity, marital status, disability, ethnic origin or nationality

3.5

Use of IT and Electronic Communication

MBC supplies you with IT and electronic communications so that you can conduct your work in a secure and compliant manner. IT and electronic communications include hardware, software and all data that is processed using these. They may include your own IT equipment when this has been authorised for work-related use by your manager. MBC logs and monitors use of its IT equipment which is connected via the MBC network.

Your responsibilities

- You must comply with MBC IT security requirements and must not share your MBC IT login details with others. You must not modify or disable security or other configuration settings downloaded by MBC to your own IT equipment, unless instructed to do so by MBC IT
- You must only use approved internet-based services (whether commercial, consumer or free-to-use) to store, process or share business information as defined in the MBC IT policy
- You must not use personal email accounts for work communications, unless you are authorised to do so by your manager. If authorised, keep your personal use of MBC IT and electronic communications, including social media use, occasional and brief and not use MBC name or brand in personal emails
- If you have a corporate mobile phone, you must follow the policy for acceptable use
- You must not conduct your personal business activities using MBC IT or communication facilities, or support others to do so. Do not store or transmit image or media files or otherwise generate high network traffic or data storage costs due to personal use
- You must not access, store, send or post pornography or other indecent or offensive material when using MBC IT and communication facilities. You must not connect to online gambling sites or conduct unlawful activities



3.6

Insider Dealing

At MBC, we comply with national and international laws on insider dealing (i.e. trading in shares or other securities when you have inside information about a company). Inside information is knowledge held within MBC that is precise, not generally available and which, if it did become available, would be likely to have a significant effect on the market price of shares or other securities of any listed company. Dealing based on inside information includes directly trading in securities and passing inside information on to another person who uses that inside information to trade in shares or other securities. Insider dealing is both illegal and unfair.

Your responsibilities

- You must not share inside information about MBC or any other listed company dealing with MBC unless you are authorised to do so
- If you come across inside information about any other publicly listed company in the course of your work, you must not deal in that company's shares or securities until any inside information you have becomes public. You must also not share the information with anyone unless you are authorised to do so

3.7

Protection of Assets

MBC assets come in many different forms - physical, electronic, financial and intangible. Whether it is a MBC laptop, our brand or even a facility or building, we expect everyone to take good care of our assets.

Your responsibilities

- You are personally responsible for safeguarding and using MBC assets appropriately - protecting it against waste, loss, damage, abuse, fraud, theft, misappropriation, infringements and other forms of misuse. Be alert to the risk of theft
- You must not unlawfully conceal, alter or destroy documents
- You must only use your corporate credit card for reasonable and approved business expenses only
- You must also play your part in protecting MBC shared assets - such as a photocopier or a building. Although you are not personally accountable or liable for these, you should help to look after them and, if someone is putting them at risk or using them inappropriately, intervene or report the matter

4. Managing Risk in Information & Communication

Our work for MBC depends on the use and exchange of information. We handle information and communicate them in many ways, and we need to consider the risks associated with these activities. These risks include disclosure of personal data and MBC Intellectual Property to unauthorised persons, putting MBC's reputation at risk and may further result in legal action.

4.1

Data Privacy

At MBC, we respect the privacy rights of our staff, customers, suppliers and business partners. We are committed to managing personal data in a professional, lawful and ethical way.

Personal data is broadly defined as any information relating to an individual's personal information such as name, contact details, race or ethnic origin, health data, sexual orientation, criminal behaviour or trade union membership.

We may only process personal data for legitimate purposes and the data must be accurate and relevant for the purpose for which it was collected for, as well as properly protected from inappropriate access or misuse. When it is to be transferred to third parties, it must be appropriately safeguarded. If we do not comply with these requirements, we risk causing harm to individuals and could face fines or litigation and in doing so, putting MBC's reputation at risk.

Your responsibilities

- You must identify the privacy risks before collecting, using, retaining or disclosing personal data, such as in a new IT system, project, clinical trials, or marketing initiative
- You must only process personal data for specific, defined, legitimate purposes and the data must be disposed of properly when no longer required
- When you process or share individuals' personal data, you must always inform them. In some cases, you will need to get their prior consent. When in doubt, always seeks advice from MBC's Ethics & Compliance Committee
- You can only publish information about our products in line with Company standards and procedures



4.2

Intellectual Property and Records Management

MBC Intellectual Property (IP) includes but not limited to brands, trademarks, patents, designs, technical know-hows, which has given us a good reputation that we all need to protect.

Records refer to a subset of information relating to a business activity, or required for legal tax, regulatory or accounting purposes or of importance to MBC's business or corporate memory. This may exist on paper, as physical items, as images or be stored in an electronically readable or audible format.

We need to ensure we use MBC IP rights and records responsibly and protect this information. It is equally important that we respect and avoid infringing MBC IP rights to others. We also have a duty to ensure we retain proper records of our business activities to meet legal and regulatory requirements.

Your responsibilities

- You must use MBC's brands and trademarks appropriately. You must classify and store MBC business and technical information accordingly, and with approved MBC access controls. You must assess the risks associated with any information you handle so you can properly manage and protect the information
- You must not disclose MBC's confidential information to a third party without permission or an appropriate written agreement, and you must make a record of the information provided under the agreement
- You must not accept confidential information from a third party unless you have permission to do so, and you have agreed to receive it under a prior written agreement. If approved to do so, you must not misuse confidential information of a third party
- If you are responsible for introducing new brands in a market or new proprietary technology, you must first consult MBC Management to mitigate the risk of infringing IP rights of others
- If you notice that a third party is infringing or misusing MBC IP rights, for example by passing on documents containing confidential information, it is your duty to report this to MBC management
- If you have been instructed by MBC Management to preserve information, you must ensure it is kept as directed



4.3

Disclosure and Business Communications

As MBC staff, everything we write or say reflects the company's reputation. Whichever media you use, either within MBC or externally, we expect you to follow MBC's rules on disclosure and business communications, including the additional rules that apply to email and social media.

All communications made to the public on behalf of MBC are subject to disclosure requirements and accordingly must be approved by MBC Management, and in certain cases the Board of Directors of MBC. Appropriate disclaimers must be used, especially when the communication contains confidential information. Every communication to the public on behalf of MBC must be accurate, relevant and in compliance with all applicable laws and regulations.

Additionally, any public disclosure must contain the date the disclosure is being made to ensure it is not considered continuously current. Providing inaccurate, incomplete or misleading information is illegal and could lead to fines, sanctions and criminal penalties for MBC and the individuals involved.

Use of personal social media for business purposes is strictly prohibited. Whether or not an employee chooses to engage in social media for personal purposes is a personal decision and not a business decision. However, social media activities that affect an employee's job performance, the performance of other MBC employees, or MBC business and reputation are governed by the Code, whether such activities are undertaken through an employee's personal social media account.

Your responsibilities

- You must not disclose information regarding any MBC's business activities unless you are authorised to do so - that applies to the things you say, as well as anything in writing
- You must not engage with the media on behalf of MBC without disclosure clearance from MBC Management
- If it is part of your role to provide information to the public and/or the investor community on MBC's business and finances, including through social media, you must ensure you have the proper clearance from MBC management to do so and that the information you give is true, accurate, consistent and not misleading. You must follow all relevant MBC standards and manuals and ensure to use a medium that is appropriate for your message. You must state where the communication comes from and include details required by local law, as well as your contact details (e.g. appropriate email footer)
- You can only use MBC-approved social media channels for business purposes and if you are an approved user which have received the required training
- You must only commit a MBC company if you have corporate authority to do so and you must not issue orders or make decisions for companies that you do not work for
- You must not engage in casual conversation on sensitive or confidential matters or send communications containing material that is racist, sexist, offensive, defamatory, fraudulent or otherwise inappropriate
- You must not use personal social media accounts for disclosing confidential business information or other business purposes
- If you use personal social media for personal purposes to discuss medical or biotechnology-related topics, or to endorse or provide testimonial of MBC and its products/services, you must disclose following statements:
 - You are a MBC employee
 - You are not speaking on behalf of MBC
 - The views expressed are your own and do not necessarily reflect those of MBC

5. Managing Risk in Third Party & International Interactions

Every time MBC deals with a customer, business partner, joint venture, Government Official, competitor or any other stakeholder, we need to understand the risks as well as the opportunities associated with it. We also need to ensure that MBC's cross-border interactions comply with all relevant trade legislation.

If we do not comply with the law, it could lead to fines for MBC or serious harm to our business. Individuals could also face fines or imprisonment.

This section is designed to help you keep your business interactions legal, ethical and professional, ensuring that you protect yourself from any suspicion of wrongdoing and safeguard MBC's reputation.

5.1

Anti-Bribery and Corruption

At MBC, we build relationships based on trust, and we are determined to maintain and enhance our reputation. For this reason, we never accept or pay bribes, including facilitation payments. Unsubstantiated claims of bribery and corruption will put risk on MBC's reputation.

Everyone involved in MBC's business must comply with the Anti-Bribery and Corruption (ABC) laws of the countries where we operate, MBC's internal ABC Policy as well as those that apply across borders.



Your responsibilities

- You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain a business advantage. You must not allow anybody else to do so, on your behalf
- You must not make facilitation payments (a minor payment to induce a government official to expedite or secure performance of a routine duty). If a facilitation payment has been requested or made, you must immediately report it to your manager and the MBC Ethics & Compliance Committee. If you make a payment because you genuinely believe your life, limb or liberty is at risk, this is not a facilitation payment but must be reported as if it were
- Know who you are doing business with by conducting the appropriate due diligence as set out in the MBC's ABC Policy
- Dealing with Government Officials poses a greater bribery risk so you must follow the mandatory requirements in the MBC's ABC Policy
- You must report corrupt behaviour. Turning a blind eye to suspicions of bribery and corruption can result in liability for MBC and for individuals

5.2

Gifts and Hospitality

It is important to do the right thing - and to be seen to do it. For this reason, we discourage our staff from accepting Gifts and Hospitality (G&H) which includes (but is not limited to) gifts, travel, accommodations, services, entertainment and any other gratuitous item, from business partners, or offering G&H to them, especially those you would not be comfortable telling your manager, colleagues, family or the public that you had offered or accepted. You should never allow G&H, either offered or received, to influence business decisions or be a reason to suspect there might be an influence. We encourage you to make MBC's policy on G&H known to our agents and business partners, including governments and its officials.

Your responsibilities

- You must not, either directly or indirectly, offer, give, seek or accept:
 - illegal or inappropriate G&H, cash or cash equivalents (including per diems unless contractually agreed), vehicles, personal services or loans in connection with MBC business; or
 - G&H where the business partner is absent, or during periods when important business decisions are being made; or
 - G&H at any value unless your manager's or MBC Management's approvals have been obtained
- All G&H given or received above the prescribed value limits (as stated in Gifts & Hospitality tab in Code of Conduct Register) for Government Officials or other third parties, any G&H that could be perceived as influencing or creating a Conflict of Interest and declined gifts of cash or of an excessive nature, including personal items should be recorded in the Gifts & Hospitality Register
- When offering G&H to a Government Official or other third parties, you must not offer or pay for additional days of travel to tourist destinations or private visits; family members/guests (unless approved by MBC's management)



5.3

Conflicts of Interest

Conflicts of Interest (COIs) may arise when your personal relationships, participation in external activities or an interest in another venture, could influence or be perceived by others to influence your business decisions for MBC. You must avoid actual, potential or perceived COIs if possible as these may jeopardise your reputation as well as MBC's.

Provided that no actual, potential or perceived COI would result, you are entitled to be active in your own time in community, government, educational and other non-profit organisations. However, in any such case, you must comply with all relevant laws, regulations and MBC policies. If there is any doubt, you must raise your concern with your manager or MBC Ethics & Compliance Committee.

Your responsibilities

- You must not let any decisions you make at MBC be influenced by personal considerations such as relationships or outside interests of yourself, family, or friends
- You must register all actual, potential or perceived COIs in the Code of Conduct Register, whether or not you think it will actually influence your decision
- If you are not sure whether such a conflict exists, you must consult your manager and/or MBC Ethics & Compliance Committee
- Withdraw from decision-making that creates an actual, potential or perceived COI, or could be perceived as creating one

5.4

Anti-Money Laundering

Money laundering occurs when the proceeds of crime are hidden in legitimate business dealings, or when legitimate funds are used to support criminal activities, including terrorism. All companies are at risk of being exploited in this way - and we must be on our guard to help protect our reputation and ensure we comply with the law.

Your responsibilities

- You must not knowingly deal with criminals, suspected criminals or the proceeds of crime
- You must follow any due diligence requirement specified by MBC so that we know who we are doing business with
- You must ensure that your business transactions on behalf of MBC do not involve acquiring, using or holding monetary proceeds or property acquired with the proceeds of crime
- You must not facilitate the acquiring, ownership or control of criminal property and must not hide the origin or nature of it
- If you have knowledge or suspicion that any counterparty is involved in money laundering in connection with its transaction with MBC, you must promptly report it to MBC Management or MBC Ethics & Compliance Committee. If in case there is a need for legal requirements, do not let the counterparty know of your suspicions and you must not falsify, conceal, destroy or dispose any relevant documents

5.5

Political Activity and Payments

We all have our own interests outside work, and you have the right to engage in lawful political activity in your own time. However, we also need to protect MBC's interests and reputation. It is therefore important that individuals keep their personal political activities separate from their role at MBC.

Your responsibilities

- You must not use MBC funds or resources, either directly or indirectly, to support and help fund political campaigns committees (PACs), political parties, political candidates or anyone associated with them
- You must not use MBC funds to make political payments under the guise of charitable donations (see also MBC's ABC Policy)
- You must always make it clear that the political views you express or actions you take are your own, and not those of MBC, unless you are explicitly required to represent the company's views as part of your role
- You must be aware of the rules on conflicts of interest and ensure that your participation in politically motivated activity does not involve you or MBC in a conflict of interest
- If you are standing for public office, you must consult and gain approval from MBC Management before doing so and comply with local laws regulating political participation



5.6

Antitrust

Antitrust laws protect free enterprise and fair competition. Supporting these principles is important to us, not just because it is the law, but because it is what we believe in. We expect MBC staff to play their part in combating illegal practices. These include price-fixing, market sharing, output limitation or bid-rigging, and anticompetitive or monopoly practices. Be vigilant in not entering into any kind of inappropriate conversation or agreement with our competitors.

Your responsibilities

- You must not agree with competitors, even informally, to fix price or any element of price, such as discounts, surcharges or credit terms
- You must not agree with competitors to reduce or stabilise production, capacity or output or to divide up particular customers, accounts or markets
- You must not rig bids or tenders
- You must not agree with others to boycott any customer or supplier except in connection with internationally imposed government sanctions
- You must not share or receive competitively sensitive information without a lawful reason. You must not discuss with competitors any matter on which competitors are not legally permitted to agree
- You must follow the principle that all decisions on MBC's pricing, production, customers and markets must be made by MBC alone
- You must leave industry meetings or other events if competitively sensitive issues arise. Ensure your departure is noted and immediately report the matter to MBC Management or the MBC Ethics & Compliance Committee
- You must report immediately to MBC Management or the MBC Ethics & Compliance Committee if you know of any potentially anticompetitive practices or if you are uncertain whether or not practices are legal



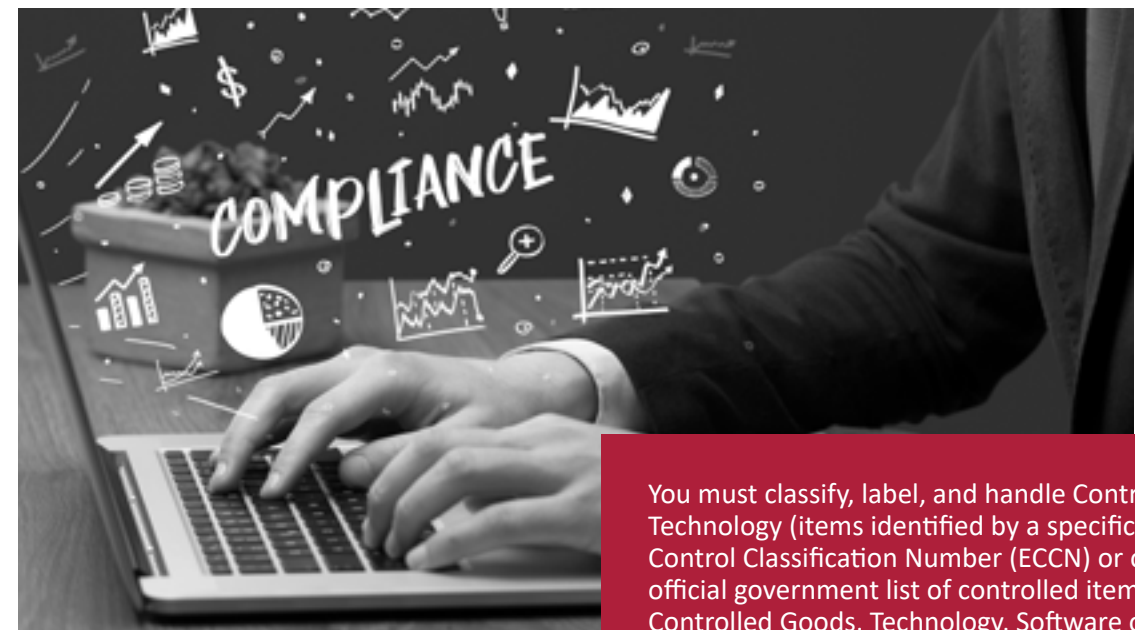
5.7

Trade Compliance

Like any other global company, we must comply with all applicable national and international trade compliance regulations. Trade compliance includes regulations governing the import, export and domestic trading of goods, technology, software and services as well as international sanctions and restrictive trade practices. Failure to comply with the applicable laws could lead to fines, delays, seizure of goods or loss of MBC's export or import privileges, as well as damage to MBC's reputation or imprisonment for individuals.

Your responsibilities

- You must obtain, retain and communicate correct customs and export control classification on all goods shipped internationally. For physical movements of goods, valuation and origin information is also required
- You must follow company guidance when travelling with company-owned equipment and hardware, including laptops, smartphones and other communication equipment
- You must follow company procedures when utilising the services of trade/customs agents or when issuing and executing an End-User Certificate
- You must ensure third parties you deal with have been properly screened against applicable sanctions lists
- You must seek assistance from MBC Management when your dealings with a third party identify suspicious facts or 'red flags'
- You must not deal in a sanctioned country or with a sanctioned party unless specifically authorised by MBC Management in accordance with company procedures. If you are authorised to deal in a sanctioned country or with a restricted or sanctioned party, you must strictly adhere to company guidance
- You must obtain advice and assistance from MBC Management when manufacturing, selling, exporting or importing military, defence or drug-related items



You must classify, label, and handle Controlled Technology (items identified by a specific Export Control Classification Number (ECCN) or other official government list of controlled items. Controlled Goods, Technology, Software or Services may require government authorisation or a licence before being exported or imported to particular parties or destinations) in accordance with company procedures.

Code of Conduct



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