

Global Code of Conduct

D.O.R.C. Dutch Ophthalmic Research Center
(International) B.V. (“DORC”)

Our Mission

Our mission at DORC (including all its affiliated companies) is to supply high quality and innovative techniques, instruments and equipment for ophthalmic surgery to enhance global eye surgery, to ease suffering and to enhance the quality of patients’ lives. We also aim to provide a shareholder return that reflects excellent performance and to reward those who invest ideas and work for our company.

We aspire to be a respected and successful healthcare company by earning and maintaining the trust and confidence of all our key stakeholders: our patients, our healthcare partners, our employees, trade unions and works councils, pensions funds, local communities and society as a whole.

Our Global Code of Conduct defines how we want to work as a professional organization. It contains the fundamental principles, rules and standards governing ethical business conduct to which we are firmly committed in order to deliver optimal value to all our customers and shareholders. Our Global Code of Conduct acts as the overarching and ultimate DORC compliance policy document governing the manner in which we expect all our employees to conduct business: with integrity and transparency. Our Global Code of Conduct forms an integral part of the terms of employment of all DORC employees. DORC insists on full compliance and will not tolerate any misconduct.

Our Customers & Healthcare Partners

We expect all our employees to focus on providing the highest quality service and products to our customers and healthcare partners (including healthcare professionals (“HCPs”), healthcare organizations (“HCOs”), while adhering to the respective regulations and laws governing these activities. We research, develop and manufacture high-quality products that meet all regulatory requirements and strive to achieve the highest standards of quality in all our products and processes. We protect patient safety by identifying, assessing, managing and reporting any product-related risks in a timely manner.

We listen to our healthcare partners and endeavour to create value and mutual benefit for them and for DORC.

Our Employees

We are committed to providing all our employees with fair and competitive remuneration based on performance and ethical conduct. We treat all our employees fairly and with respect. We expect all our employees to demonstrate respect towards each other. We do not tolerate any form of harassment or discrimination based on personal characteristics such as nationality, gender, age, ethnicity, religion, sexual orientation or disability. We protect our employees from unfair or unethical working conditions, including bonded, forced or child labour, or any unsafe working conditions.

Our Shareholders

We are committed to financial integrity and transparency. Financial risks and operational measures must be appropriately reviewed and approved. We provide timely, accurate and complete financial information to our shareholders and financial authorities. We maintain effective controls over financial reporting to ensure a complete and accurate record of all our financial transactions.

Conflicts of Interest

We do not allow personal interests to influence our business judgment or decision-making (see separate Conflicts of Interest Policy).

Anti-bribery and corruption

We do not tolerate any form of bribery or corruption. We do not bribe any public official or private person and we do not accept bribes (see separate Anti-Bribery and Corruption Policy).

Fair competition

We are committed to fair competition and will not breach competition laws and regulations (see separate Anti-Trust Policy).

Marketing practices

We market and sell our products in compliance with all applicable rules and regulations and in accordance with high ethical standards (see separate Policy on interactions with Healthcare Professionals).

Third party integrity

We expect all third parties with whom we work to comply with the law and to adhere to ethical business practices. We will conduct risk-commensurate due diligence on all third parties with whom we interact (see separate Due Diligence Policy). We comply with all applicable sanctions laws and regulations (UN, EU, US, UK, NL and other local sanctions laws and regulations), including but not limited to the trade restrictions in all countries in which DORC operates. DORC prohibits doing direct or indirect (through distributors or any third party) business with any sanctioned entity or individual (customer, supplier, intermediary, etc.).

Health, safety and environment

We aim to be a leader in all aspects of occupational health, safety and environmental protection. We systematically identify and manage health, safety and environmental risks in our activities and over the entire value chain of our products

and services. We proactively foster and encourage a strong culture of safe behaviour. We make efficient use of natural resources and minimize the environmental impact of our activities and products over their life cycle

Misconduct

There may be rare occasions when misconduct occurs. Misconduct is any action that violates the DORC Global Code of Conduct, other DORC policies, ethical and industry codes and/or laws and external regulations. All DORC employees are required to report potential misconduct to the DORC Compliance Officer or report the issue via one of the other channels listed below without further disseminating the information:

- Their supervisor
- HR manager
- Via the confidential DORC speak-up reporting system (see separate Speak-up Policy)

Employees who report potential misconduct or who provide information or otherwise assist in any investigation of potential misconduct will be protected from any form of retaliatory action. However, an employee who makes a report of potential policy violations is not automatically immune from disciplinary procedures, if he/she is involved in misconduct.

Breaches of the DORC Global Code of Conduct will not be tolerated and can lead to disciplinary action up to and including termination of employment.



Thierry Leclercq
CEO



Marco van Straaten
CFO