

CODE OF CONDUCT

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

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OUR MISSION

Our mission at DORC (including all its affiliated companies) is to enhance eye surgery globally, by supplying high quality and innovative instruments, equipment and liquids for ophthalmic surgery. We aim to deliver innovative and quality solutions for eye disorders, to ease suffering and to enhance patients' quality of life. Additionally, we strive to recognize and reward the dedication, expertise, performance, and ideas of the employees that help our company grow and deliver value.

We aspire to be a respected and successful healthcare company by earning and maintaining the trust and confidence of all our stakeholders: our healthcare partners and their patients, our employees and works councils, our shareholders, our business partners, trade unions, pensions funds, notified bodies, local communities and society as a whole. Maintaining this trust is essential for our long-term success and our responsibility as a global healthcare contributor.

Our 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 stakeholders. Our Code of Conduct acts as the overarching compliance framework governing ethical and responsible business conduct and serves as the primary DORC compliance policy document governing how we expect all our employees to conduct business: with integrity, transparency, accountability, respect for the law, industry standards, and internal policies. Our Code of Conduct forms an integral part of the terms and conditions of employment for all DORC employees. Adherence to the Code of Conduct is mandatory. DORC insists on full compliance and will not tolerate any misconduct or behaviour that deviates from our values, principles, or legal obligations.

BEHAVIOUR STANDARDS AND MISCONDUCT MANAGEMENT

At DORC, we strive for a workplace built on respect, fairness, trust and integrity. Our interactions—whether with colleagues, customers, suppliers, or other business partners—must reflect courtesy, professionalism, and mutual appreciation. Every employee is expected to uphold these standards and to behave in accordance with our core values, demonstrating honesty, reliability, trust and respect for human dignity in all professional conduct. Further guidance on expected conduct is provided in our Rules of Conduct.

DORC rejects any form of child or forced labour, slavery, or human trafficking, and we support fair, safe and equitable working conditions. Humane treatment in the workplace is a fundamental principle for us. We prohibit discrimination on any legally protected basis, including religion, belief, political opinion, race, sex (including pregnancy, childbirth, and maternity), nationality, sexual orientation, civil status, disability or chronic illness, age, working hours, type of contract, or any other characteristic protected by law. We do not tolerate (sexual) harassment, bullying, intimidation, aggressive or violent behaviour or any other form of disrespectful behaviour towards individuals or groups. These principles as referred to in our policies listed below, reflect our commitment to a safe, equal, and dignified work environment for all employees.

Misconduct refers to any action or behaviour that violates this Code of Conduct, DORC policies, ethical or industry standards, or applicable laws and regulations. This includes undesirable behaviour, discrimination, harassment, bullying, or any other conduct that undermines a respectful and safe work environment.

All employees must report suspected misconduct by using one or more of the following contact points:

- Their (line) manager
- The Human Resources Department
- The Confidential Advisor(s)
- The DORC Compliance Officer

If employees feel that they cannot or do not wish to address a potential misconduct and/or violation of laws or internal rules directly to one of the above contact points, they may use the confidential DORC Speak Up reporting system. The DORC Speak Up system allows employees to report potential violations securely. All concerns submitted in good faith will be treated confidentially and taken seriously. Employees will not face adverse consequences for making a report in good faith, even if the allegation is not confirmed. However, intentionally false or abusive reports, particularly those aimed at harming others, will not be tolerated.

Reports must not be shared beyond these channels. Employees who report concerns in good faith or assist in an investigation are protected from retaliation. Reporting a concern does not exempt an employee from appropriate disciplinary measure if they are themselves involved in misconduct.

Any violation of the DORC Code of Conduct is taken seriously and may result in corrective or disciplinary measures, in accordance with the applicable DORC policies and procedures.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE

We are committed to conducting business activities ethically and responsibly, and with respect for people, society, and the environment.

DORC attaches importance to conduct business with parties that respect principles of sustainable development and adhere to internationally recognized fundamental standards for occupational health and safety, environmental protection, labour and human rights as well as responsible corporate governance, to contribute to building a greener and sustainable society. By integrating these practices into our operations and partnerships, DORC aims to contribute to a more sustainable, safe, and socially responsible global community.

OCCUPATIONAL HEALTH AND SAFETY

DORC is committed to providing a healthy working environment and maintaining safe workplaces for all employees. Workplace safety and protecting the health of all employees are fundamental principles for DORC. We continuously work to maintain safe working conditions and improve our occupational health and safety practices.

Protecting the physical and mental well-being of our employees is essential to their performance, motivation, and to the long-term success of our company. Managers and supervisors play a key role in ensuring a safe working environment. They are responsible for safeguarding their teams and for providing the necessary instructions and support to work safely and responsibly.

Every employee shares responsibility for maintaining a safe workplace and must follow all applicable safety procedures, report hazards or concerns immediately, and contribute to a work environment that supports health, safety, and well-being.

OUR CUSTOMERS AND HEALTHCARE PARTNERS

We are committed to providing high quality products and services to our customers, healthcare partners (including healthcare professionals and healthcare organizations) and distribution partners. All employees are expected to engage with these stakeholders responsibly and in compliance with applicable laws and regulations, and industry standards.

We research, develop and manufacture products that meet all regulatory requirements and continuously strive to achieve the highest standards of quality in our products and processes. Product safety is essential at every stage of the product lifecycle: from design and development through procurement, production, installation, and service. By identifying, assessing, managing and reporting any product-related risks in a timely manner, we protect patient safety and safeguard trust in our products and our company.

We value the expertise of our healthcare partners and work collaboratively to create mutual value, strengthen trust, and support long-term relationships that contribute to our mission.

FINANCIAL GOVERNANCE AND REPORTING

We are committed to financial integrity and transparency. Financial risks and operational measures must be appropriately reviewed and approved in accordance with our internal controls and governance processes.

We provide timely, reliable, accurate and complete financial information to relevant authorities and stakeholders. We maintain effective controls over financial reporting to ensure that all our financial transactions are recorded accurately and in compliance with applicable laws and regulations.

MARKETING PRACTICES

We market and sell our products in compliance with all applicable laws, regulations and ethical industry standards, as well as internal policies. Our marketing activities must be ethical, transparent, and accurate. All materials, statements, and communications related to our products must accurately reflect approved product information, be supported by available evidence, and remain within all regulatory requirements.

FAIR COMPETITION AND ANTITRUST

We are committed to fair competition and comply with all applicable competition and antitrust laws and regulations. Employees must conduct all business activities in a way that supports a free and fair market and must avoid any behaviour that could improperly affect the market or appear anticompetitive.

We compete responsibly in our marketing and commercial activities. All product and service claims must be truthful, accurate and not misleading, and we must never seek competitive advantage through deceptive or unethical practices.

AVOIDING CONFLICT OF INTEREST

DORC expects all employees to avoid situations where personal interests or relationships could conflict, or seem to conflict, with their work responsibilities and the interests of DORC.

Conflict of interest may arise, for example, from private business activities, financial interests, secondary employment, or the activities of family members or close personal contacts.

Employees must handle such situations with transparency and integrity. Any actual, potential, or perceived conflict of interest must be promptly disclosed to the employee's line manager or the Human Resources Department.

By identifying and managing conflict of interest, employees help protect DORC's integrity, safeguard trust, and ensure that all business decisions are made fairly, transparently, and in the best interest of the company.

ANTI-BRIBERY AND ANTI-CORRUPTION

DORC conducts business in compliance with applicable anti-bribery and anti-corruption laws. Employees must never offer, promise, request, or accept any form of bribe or corrupt payment, whether involving a public official or a private individual. This includes financial benefits, gifts, hospitality, services, or any other personal advantage intended to influence a business decision.

Corrupt behaviour includes abusing one's position for personal gain or for the benefit of a third party. Even the appearance of improper influence can damage trust and expose both the employee and our company to legal and reputational risks. Invitations, gifts, or other benefits may only be exchanged when they are modest, lawful, socially appropriate, and clearly not intended to influence decision making. Particular caution is required when dealing with public officials and individuals working in the medical sector, as stricter legal and ethical standards often apply.

THIRD-PARTY INTEGRITY AND COMPLIANCE

We expect all third parties we engage to comply with applicable laws and to adhere to ethical business practices and professional standards. We conduct risk-based due diligence on all third parties to ensure that they meet our integrity expectations.

As a globally active company, DORC complies with all applicable international, regional, and national laws governing trade, export controls, customs requirements, and economic sanctions (including EU, US, UN, UK and other local laws and regulations).

DORC prohibits any direct or indirect business with any individuals or entities that are subject to applicable sanctions, embargoes or other trade restrictions.

All employees must follow applicable sanctions and customs regulations in every transaction.

DATA PRIVACY

We respect the privacy of our employees, customers, business partners and other relevant individuals. We protect personal data as an essential responsibility and requirement of lawful and responsible business conduct.

We handle personal data in compliance with applicable international, regional, and national data protection laws, as well as our internal Privacy Statement and related policies.

All employees are responsible for handling personal data with care, confidentiality, and integrity. Any actual or suspected data protection incident must be reported immediately through the appropriate reporting channels outlined in the Internal Complaints Procedure.

The following section confirms the approval of this Code of Conduct:

D.O.R.C. Dutch Ophthalmic Research Center (International) B.V., represented by its Managing Directors Dominik Beck and Elise Godthelp

Zuidland, February 17, 2026

Name : Dominik Beck

Position: Managing Director

Zuidland, February 17, 2026

Name : Elise Godthelp

Position: Managing Director