

Code of **Conduct**

ZEUS COMPANY LLC & ITS AFFILIATES



Our
Company

Our
Code

Our
Commitment

Message from **Paddy**



As Zeus continues to grow, innovate, and build a culture based on the principles of integrity, respect, and transparency, it's our duty to continue to uphold the highest standards of ethical conduct and compliance in all that we do. Simply put, Zeus and its team members have a responsibility to follow our Code of Conduct.

Our organization embraces this Code because it protects and advances some of our greatest assets: OUR PEOPLE, OUR REPUTATION, and OUR BRANDS. I ask that you read this Code carefully and think deeply about how your everyday actions may affect Zeus and its team members, shareholders, customers, suppliers, and communities. You may face ethical, moral, or legal decisions in your day-to-day work or other engagements with Zeus, and I urge you to use this Code as a resource and to raise any questions or concerns through the channels outlined in this Code. Thank you for your cooperation and dedication to Zeus.



PADDY O'BRIEN
CHIEF EXECUTIVE OFFICER

Understanding & Using The Code of Conduct



Why We Have a Code of Conduct

A Code of Conduct is the cornerstone of compliance and promotes the principles of ethical conduct. Our Code can help when we need clarity on policies or guidance in decision making. While this Code may not give you the answer to every question or cover every situation, it does provide an understanding of our ethical and legal standards by outlining our responsibilities under our policies and applicable laws. This Code and its related policies are intended to supplement, but not replace, Zeus employee handbooks and specific local policies or procedures that are required by law. All such items should be considered depending on the particular situation or question at hand.



Living by the Code of Conduct

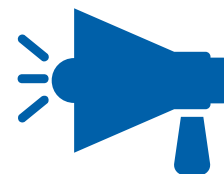
This Code applies to all global team members and, in several cases, sets forth our expectations of those outside of Zeus who do business with us. Because our Code reflects who we are and the ethical ways we do business, Zeus takes violations of the Code or its associated policies very seriously. If a Zeus team member violates this Code or any other Zeus policy, whether or not specifically included or referenced in this Code, they may be subject to disciplinary action up to and including termination of employment, and, if warranted, legal action. Zeus may also terminate its relationship with individuals or organizations doing business with Zeus or acting on its behalf if they act in a manner inconsistent with our Code or applicable policies. Any such actions will be taken in accordance with all applicable laws.



Use this Code of Conduct as a Resource

Read and understand the guidance and policies provided in this Code and live by them every day. The Code includes links to find certain additional information, and there are several options to seek guidance. Help others follow our Code through leading by example and creating an environment of compliance.

How to Raise Concerns



To make a report, you can contact any of the following resources:



We are counting on everyone to do their part when it comes to asking questions or raising concerns. In fact, Zeus expects its team members to speak up if they see any unethical or illegal behavior or any actions that are not consistent with Zeus' policies. By asking questions and reporting potential problems, you are protecting Zeus and its reputation. If you find yourself in a situation where the right course of action is not clear, remember that you are not alone. Zeus provides multiple resources for advice and help.

Avenues for Reporting

Zeus has an **Open Door Policy** to allow its team members to ask questions or report any concerns. Through this avenue, team members may speak to any manager or supervisor, or anyone within the HR or Legal departments.

The Zeus Integrity Line is available for anyone to report compliance concerns at any time. To access the Integrity Line, call toll-free at 888-249-1503 (U.S.), 1-800-901-762 (IRE), or [+506-4002-3724] (Costa Rica), visit



www.Zeusintegrityline.com, or scan this QR code.

No Retaliation

Zeus is committed to providing a safe and confidential means for reporting concerns without fear of retaliation or other adverse consequences.

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Making Sound Decisions **in the Workplace**

Respect and integrity are the cornerstones of our workplace, where we foster collaboration, and ensure a safe inclusive environment while upholding our reputation through responsible behavior.



Treat Everyone with **Respect**

Treating each other in a respectful way allows each of us to work to the best of our ability. We must always demonstrate respect towards co-workers, suppliers, customers, and anyone else with whom we interact on behalf of Zeus.

Always Remember

- Be considerate of those around you
- Be respectful of other people's opinions and beliefs
- Never mistreat someone because of appearance, background, or beliefs
- Discrimination, harassment, and bullying have no place at Zeus

Recognize Harassment - What is it?

Harassment is certain conduct (including words, actions, pictures, or physical contact) that is not welcome. Examples of harassment may include:



**Racial, religious, or sexual
jokes or inappropriate
comments**



**Unwelcome
physical contact**



**Offensive emails, photos
or videos**

While it is not possible to list all circumstances that may constitute harassment, when we treat people respectfully, we set the tone for everyone around us.

Promote an Inclusive **Workforce**

Working together starts with ensuring that all team members can be themselves. Team members should understand that Zeus' commitment to inclusion extends to all aspects of company life.

Always remember: Respect the dignity and diversity of all people and create an inclusive environment free from discrimination, harassment, and bullying.

Ensure a **Safe, Non-Violent, Drug and Alcohol-Free Workplace**

We are committed to ensuring a safe environment at each of our facilities to protect our team members, contractors and visitors. We adhere to high safety standards and comply with all applicable health and safety regulations. Together, we create a safe environment.

Always Remember

- Promote a positive attitude towards safety.
- Do not continue any work that becomes unsafe or hazardous.
- Report any safety risk or concern immediately.
- Comply with health and safety procedures and instructions relevant to your work.
- Help ensure that everyone we work with, including contractors and visitors, is familiar with and follows applicable health and safety procedures and instructions.
- Don't make threats or show signs of physical violence.
- Never bully, threaten, intimidate, or harm another person or their property.
- Do not possess, conceal, or use weapons, including firearms, knives/blades, or other devices that are primarily used to inflict injury while on any Zeus, customer, or supplier facility or while conducting Zeus business.
- Do not possess or use alcohol or any illegal drug, including cannabis or THC-containing products, regardless of prescription, and do not operate under the influence of such substances while on any Zeus, customer, or supplier premises or while conducting Zeus business.

Protect Confidential Information

We may have access to various types of intellectual property and/or confidential information belonging to Zeus or others. It is our obligation to protect such information so that it remains confidential.

Always Remember

- Never use Zeus, customer, supplier, or other confidential information other than for its permitted purpose.
- Understand the legal and contractual limitations on the use of confidential information.
- Comply with nondisclosure agreements to which Zeus is a party. Do not accept confidential information unrelated to your job.
- If you receive information that is not marked confidential, but you believe it is confidential, bring it to the attention of the person who gave it to you and follow up if necessary to make sure the information is properly classified and protected.

Protect Zeus' Assets

Zeus also has valuable property and assets, including technology, equipment, and facilities. We must protect Zeus' property and assets from damage, loss, misuse, or theft, and use Zeus' property and assets only for their permitted purposes.

Always Remember

- Take good care of all Zeus property
- Do not use company property for personal benefit or other impermissible purposes



Recognize

Conflicts of Interest

Being part of the Zeus team means we do not allow our personal interests to interfere with doing what is in the best interests of Zeus.

Always Remember

- Avoid interests, activities, or relationships that prevent you from remaining objective and fair when making business decisions on behalf of Zeus.
- Disclose all actual or potential conflicts of interest promptly to your manager or an appropriate Human Resources or Legal resource.
- The principles around conflicts of interest also apply to your immediate family members. For example, a conflict may exist if your spouse is offered a position with a Zeus customer, supplier, or competitor.

Some types of personal interest will always pose a conflict at work. If you recognize or encounter one of these, then disclose the situation right away:

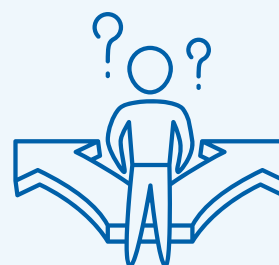
Outside employment or work that limits your ability to meet your obligations at Zeus.

Using Zeus' facilities or resources for reasons unrelated to your job.

Holding a financial interest in a competitor except where such ownership consists of securities of a corporation regularly traded on the public stock market.

Hiring or directly supervising an immediate family member or romantic interest.

Allowing supplier or other relationships to improperly influence your business decisions or objectivity.



When in doubt about an interest that could conflict with the best interests of Zeus, please seek guidance from your manager, HR, or Legal.

Making Sound Decisions **in the Marketplace**

At Zeus, we achieve our goals by upholding integrity, honesty, and ethical behavior; by avoiding actions that could harm our reputation, and complying with laws everywhere we operate.

Abide by **Laws**



Zeus team members and anyone doing business with Zeus must adhere to all applicable laws and regulations at all times when acting for or on behalf of Zeus. This includes full adherence to all applicable anti-bribery, anti-corruption, fair competition, and trade compliance laws and regulations.

Anti-Bribery and Anti-Corruption Laws

- Always fully comply with the anti-bribery and anti-corruption laws of the countries in which we do business, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act of 2010, the Irish Criminal Justice (Corruption Offences) Act 2018, the Irish Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, and all other applicable anti-bribery and anti-corruption laws.
- Always win with integrity. Never offer, promise, authorize, or give anything of value to anyone, either directly or indirectly through a third party, to influence, induce, secure, or reward a business decision or obtain an improper advantage.

Fair Competition

Zeus is committed to maintaining a fair and competitive business environment. We believe in competing ethically and lawfully, ensuring that our actions reflect integrity and respect for our competitors, customers, and the market.

Always Remember

- Adhere to all applicable antitrust and competition laws and avoid any activities that could be perceived as anti-competitive, such as price-fixing or market allocation.
- Represent our products and services truthfully. Do not make false or misleading statements about our competitors or their offerings.
- Treat everyone, including competitors, with respect. Refrain from any type of unfair practices, such as stealing trade secrets, sabotaging competitors' operations, or spreading false information.

Trade Laws

At Zeus, we strictly adhere to all trade compliance laws and regulations governing the transfer of goods and technology, including those related to export control.

Always Remember

- Be aware of, understand, and abide by all trade compliance, export control, and similar laws and regulations.
- Be aware of what you are exporting, its destination, the end user, and the end use. Provide customs authorities with complete and accurate import documentation, including detailed product descriptions when classifying goods.



Product **Quality**

Our customers rely on Zeus' products to advance and enhance the products they make, which in many cases have critical medical applications. We need to remain focused on the markets in which our products are used and ensure we continue to live up to the ever-increasing expectations of our customers. For these reasons, we must strive to produce only the highest quality products utilizing robust processes. We must follow all laws, regulations, and Zeus' policies and procedures to meet these expectations.

Zeus team members must never willfully conceal defective work or materials, intentionally falsify records, or make false claims about the products or services we provide to our customers.

Zeus managers and supervisors have additional responsibilities in this area and must ensure that their direct reports are properly trained regarding Zeus' policies and procedures, and that everyone's actions reinforce Zeus' culture of quality.

Communicate **Responsibly**

We are all an important part of Zeus' brand, and communication is a vital tool for managing our business both internally and externally.

Always Remember

- When communicating, whether internally or externally, always engage in truthful, factual, and well-balanced communication.
- Only the CEO and other designated persons are permitted to speak with the media. If you receive inquiries from the media, even in a crisis situation, please refer them to Corporate Communications.
- Demonstrate good judgment when using social media.
- Do not disclose Zeus' or others' confidential or non-public information while using social media.
- Anything you post could be seen and commented on by many people.

Making Sound Decisions in Our Community

A measure of our success is our positive impact on team members, the environment, and local communities. Upholding our values, we drive sustainable growth through corporate social responsibility, environmental protection, and the promotion of human rights.

Corporate Social **Responsibility**

As a socially responsible company, Zeus is dedicated to making a meaningful and positive impact on the communities where we operate.

Always Remember

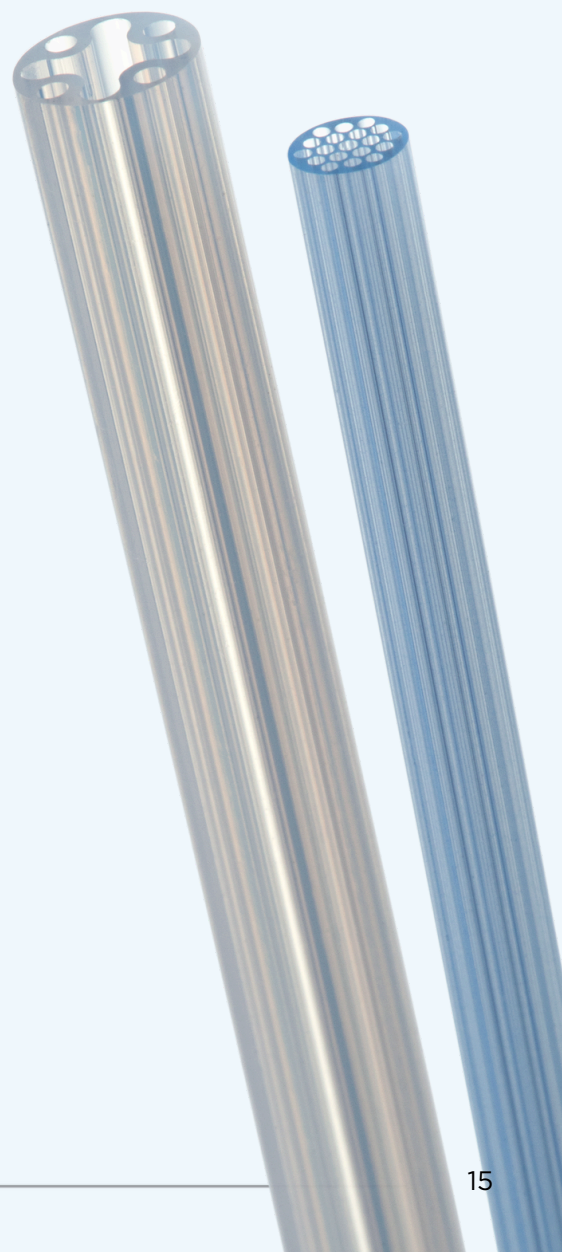
- Organizations receiving funding from Zeus must be qualified entities according to the appropriate jurisdictional governmental revenue requirements.
- No tangible benefit may be received by Zeus or its team members from the organizations receiving funding.

Protect the **Environment**

Zeus is committed to and strives to protect our environment. Sustainability and concern for the environment are important parts of our business strategy.

Always Remember

- Zeus team members must always comply with all applicable environmental laws.
- Consider environmental issues in setting business strategies and initiatives.
- Set objectives, targets, and programs to continually improve environmental performance.
- Consider the wider environmental impact of our activities, including those of other stakeholders and those doing business with Zeus.



Promote **Human Rights**

We are committed to a work environment that is free from human trafficking and slavery, and in compliance with all human rights and worker protection laws, including all child labor laws. Zeus does not tolerate human trafficking or slavery anywhere in our global organization or supply chains and expects all team members and suppliers to comply with all applicable human rights and worker protection laws.

Always Remember

- We must not engage in any activity or practice that allows for any form of modern slavery or human trafficking.
- Communicate our expectations to our suppliers and require them to meet the standards set forth in our Supplier Code of Conduct.
- Never use misleading or fraudulent practices during the recruitment of team members.
- Abide by all worker protection laws, including, without limitation, all child labor laws.

