

ANNEX 9

POLICY TO FIGHT DISCRIMINATION, VIOLENCE AND HARASSMENT IN THE WORKPLACE

1. PURPOSE

This policy aims to prevent and fight all forms of discrimination and violence and harassment occurring in the workplace, whether related to or resulting from work.

2. SCOPE OF APPLICATION

The Management and all members of the Company, employees of the Company, employees of IKA, temporary employees, trainees, prospective employees and other persons dealing or cooperating with the Company.

3. ZERO TOLERANCE STATEMENT ON DISCRIMINATION, VIOLENCE AND HARASSMENT - RISK ASSESSMENT

AXIS MEDICAL hereby expresses its commitment to address and eliminate discrimination, violence and harassment in the workplace to ensure an environment where respect for human dignity prevails and no discrimination on the sole basis of personal characteristics and choices. It is declared that all forms of discrimination, violence and harassment in the course of work, whether related to or arising from work, are strictly prohibited.

Innuendo, mockery, obscene, sexual or racist jokes or comments, the use of offensive language, comments about someone's physical appearance or character that may cause shame or embarrassment, stalking, stalking and unwanted verbal or physical attention towards someone, sending messages with sexual content via SMS, e - mail are strictly prohibited, social media, fax or letter, insulting and persistent questions about someone's age, marital status, personal life, sexual interests or preferences, and similar questions about their race or ethnicity, including their cultural identity and religion, sexual gestures or persistent requests for dates or threats, implying that one's sexual favors may advance one's career or that refusal

to engage in a sexual relationship may adversely affect one's career, rude gestures, touching and any kind of unwanted physical contact, making malicious comments or insulting someone primarily on the basis of age, gender, marriage type discrimination, cohabitation, pregnancy and maternity, any disability, sexual preference, religion or belief, verbal or gestural threats, insults in public or in private, belittling or ridiculing a person or his or her abilities, whether in private or in front of others, outbursts of anger against someone, persistent or unjustified criticism, the exclusion from social events, work group meetings, discussions and collective decisions or planning, cyberbullying, abusive emails, letters and phone calls.

The company will investigate any such complaint, showing zero tolerance for discrimination, violence and harassment, with confidentiality and respect for human dignity, and will not obstruct the filing of such complaints. It shall provide assistance and access to any competent public, administrative or judicial authority in the investigation of any incident of violence and harassment.

For employees and those associated in any way with the company who violate the obligations arising from this Policy, appropriate measures will be taken, as appropriate, to prevent and avoid a similar incident or conduct from recurring.

Harassment prohibited by this policy includes, but is not limited to:

- Verbal harassment (e.g., abusive comments, insults, or accusations).
- Physical harassment.
- Visual forms of harassment, e.g., posters, cartoons, caricatures, photographs, or drawings that are derogatory based on characteristics protected by law.
- Retaliation or intimidation for reporting or threatening to report any of the aforementioned forms of harassment or for cooperating in the investigation of a harassment incident.

4. TERMS

4.1. Distinctions

Discrimination is defined as discrimination based on sex, race, colour, ethnic or social origin, genetic characteristics, language, religion or belief, political opinion, disability or health status, age, or sexual orientation.

4.2. Violence and Harassment Organisation & Responsibilities

Violence and Harassment constitute forms of conduct, acts, practices or threats of such, which are intended to, leading or likely to lead to physical, psychological, sexual or economic harm, whether manifested singly or repeatedly.

Harassment also includes conduct which has the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating, degrading or offensive environment, whether they constitute a form of discrimination, and shall include harassment on the grounds of sex or other grounds of discrimination.

4.3. Sexual harassment - Sexual harassment

Gender-based harassment is the forms of conduct related to a person's gender that are intended or have the effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating, humiliating or offensive environment. These forms of conduct include sexual harassment and forms of conduct related to a person's sexual orientation, expression, identity or gender characteristics. Sexual harassment is defined as unwanted conduct of a sexual nature, including unwanted sexual advances, requests for sexual favours and any other unwanted physical or verbal conduct of a sexual nature. Such conduct may be expressed by a person of either sex or includes harassment of a person of either sex. For illustrative purposes, some examples of sexual harassment are as follows:

- Offering benefits in exchange for sexual favors or creating an environment that promotes "sexual intercourse" as a means of professional development in the workplace.
- Retaliation or threat of retaliation after the rejection of sexual advances.
- Indecent gestures, display of sexually offensive graphic materials on electronic and printed materials (e.g., e-mail, voice mail, books, files, photographs, etc.), cartoons or posters, or any material with obscene or sexual innuendo.
- Derogatory comments, sexual innuendo, use of sexual "language" or "jokes" sexual content.
- Verbal sexual harassment or suggestions.
- Verbal abuse of a sexual nature: sexual comments about a person's body, use of sexually derogatory comments in describing a person, sexually suggestive or obscene comments in conversation, letters, invitations, notes or other comments, and adjectives.
- Physical contact: touching, pinching, gestures of a sexual nature, hitting, grabbing, pushing, etc.

The above acts are indicative and do not constitute an exclusive list of prohibited acts. The employee or third party who engages in such prohibited conduct shall be and shall bear full responsibility for his/her actions.

4.4. Retaliation

It is prohibited for any employee or third party, in any way connected with him/her, to take retaliatory action against another employee or third party who opposes violence or harassment of any kind, files a complaint, testifies, assists or participates in any incident investigation process.

5. MEASURES TO PREVENT, CONTROL AND REDUCE RISKS - INFORMATION AND AWARENESS-RAISING ACTIVITIES

All employees and those associated in any way with the company must comply with this policy, which applies both in the workplace and in areas associated with company meetings, conferences and work-related events, whether physically present, online or by telephone. This ensures an accessible, safe and friendly working environment where relations between employees, partners, and management are characterised by mutual respect, courtesy, honesty, understanding, trust, cooperation and support.

The company takes all appropriate measures and makes all reasonable adjustments to working conditions to protect employment and support employees - victims of domestic violence. It also takes all necessary measures to inform and raise awareness among staff, using appropriate means (e.g. printed and electronic materials, etc.) to combat violence and harassment, ensuring that everyone is aware of the policy and procedures against incidents of violence and harassment and knows where to turn in case of violence or harassment.

Managers shall be trained to recognise discrimination, violence and harassment at work and provide the necessary support to staff and partners.

Employees are encouraged to report incidents of discrimination, violence and harassment in the workplace.

6. REPORTING, INVESTIGATING AND DEALING WITH COMPLAINTS

If any employee or a third party who is in any way connected to the company believes that he or she has been subjected to discrimination, violence or any form of harassment, or if he or she has observed that such conduct is taking place in the workplace, he or she must report the incident. The company will treat all incidents of reporting discrimination, violence and harassment with the utmost confidentiality and discretion.

If any employee or third party who is in any way associated with the company believes that he or she has been subjected to retaliatory conduct as a result of filing a complaint or assisting

in the process of investigating incidents of discrimination, violence and/or harassment, he or she must immediately report the matter to management.

Complaints of conduct in violation of this policy will be accepted in writing, anonymously or anonymously, and will be promptly and thoroughly investigated.

To maintain workplace safety and the integrity of investigations, the company may move employees or modify their work schedules pending the outcome of the investigation. During this period, partial or total access to buildings and/or facilities may not be permitted.

If the outcome of the investigation indicates that an incident of discrimination, violence or harassment or retaliation has occurred, the company will take appropriate corrective, disciplinary and/or other actions. These actions may include:

- (a) disciplinary sanctions,
- (b) change of position, hours, place or manner of performing the work,
- (c) termination of the employment contract or cooperation agreement,
- (d) legal action.

In all cases, the offender may also be subject to criminal or civil liability by the applicable legislation. These Regulations apply in parallel with the general legislation in force on the protection of the employee's personality and do not affect his/her legal rights in civil and criminal law, as well as the rights to file a complaint with the competent supervisory authority.

7. MALICIOUS COMPLAINTS

Complaints proven to be manifestly malicious will be considered inadmissible and further investigated both as to the motives and the parties involved, to restore order by all lawful means and means.

8. FURTHER INFORMATION - REPORTING PERSONS

All queries relating to the implementation or interpretation of this policy should be submitted to the Management, who is designated as responsible for providing information and advice to staff and for matters relating to the prevention and management of violence and harassment in the workplace.