

CODE OF ETHICS

SUBMISSION

The Asociación Mexicana de Industrias Innovadoras de Dispositivos Médicos, AMID, is a medical devices and diagnostic systems global leaders' innovation association, which promotes the health services in Mexico improvement through better innovations access by increasing people's quality lives.

AMID's members recognize it is needed to stick to ethical standards and meet the applicable legal and regulatory provisions to lay the foundations that ensure equal conditions among competitors affiliated with the AMID, transparent business granting certainty having the conviction that the Compliance generates sustainable business and encourages a fight against corruption.

SCOPE

The provisions of this Code are applicable to all AMID's members and are intended to establish the guidelines for ethical corporate behaviour.

All its members are bound to meet this Code of Ethics, likewise they are liable for requiring its compliance to the distributors, sub-distributors, agents, sales representatives, value added resellers and / or channel partners (in forward "commercial intermediaries"), who commercially represent AMID member companies, as well as the Codes, Procedures stem off, and any other document issued by AMID from time to time.

PRINCIPLES

All AMID members are bound to conduct themselves in their commercial relations according to the following principles:

Integrity: Act with honesty, sincerity and fairness with all parties.

Independence: Relations with Health Care Professionals, government agencies and entities, companies that market industry products, among others, should not be used by Associates to influence or bias, through undue or improper advantages, their business decisions avoiding any potential or actual conflict of interest. Likewise, this interaction will be independent of the sales transactions or the use or recommendation of AMID associate's products.

Legality: The agreements with the Health Care Professionals, dependencies and governmental entities, companies that commercialize the industry products, among others, must observe at all times the legal dispositions adherence to the force in economic competition matters, anti-corruption, regulation health, among others; as well as commercial market standards.

Development: The relations with the Health Care Professionals, dependencies and governmental entities, companies that commercialize products of the industry, among others, are destined to promote medical technology, innovation; and care and improvement of patients' quality of life.

Transparency: The AMID members must at all times, have the mechanisms that allow them to ensure on time and timely their business registration of transactions, both in their relationship with Health Care Professionals, agencies and government entities, companies that sell products for the industry as well as for their own transactions.

In their relations with the public servants' dependencies, entities and productive companies of the State, the AMID partners agree to conduct themselves according to the principles of legality, honesty, loyalty, impartiality and efficiency.

CHAPTER 1

DEFINITIONS

For the purposes of this Code, the following definitions shall apply:

- (a) AMID: to the Asociación Mexicana de Industrias Innovadoras de Dispositivos Médicos, A.C.
- (b) Associates: They are all those companies that make up AMID by agreeing with the Association's Directors Board.
- (c) Interaction Code: Interaction Code with Health Care Professionals in force.
- (d) Ethics Committee: the body in charge of promoting a strict and disinterested observance culture at all times for ethical standards, applying and interpreting the provisions of this Code related to the Associates conduct.
- (e) Conflict of interest: to that potential or real situation where the personal, family or business interests of some associate(s) may affect their behaviour impartiality or the relationship within their commercial activities.
- (f) Executive Director: The one who observes the association's interests, being appointed by the Directors Board and their functions will be defined according to the employment contract.
- (g) Non-compliance reviewing group: is the Association compliance monitoring body composed by at least 3 members, including an honorary one. The Review Group members will be appointed by the Executive Direction, seeking at all times to avoid the conflict of interest.

- (h) Industry: all those companies that make up the medical devices innovative industry established in the country.
- (i) The Codes: all the current AMID codes.
- (j) Procedure: Complaints Procedure and Complaints for Non-compliance with Current AMID Codes.

CHAPTER 2

ASSOCIATES RIGHTS

The Associates will enjoy the following rights:

- (a) Being part of the Directors Board, Committees and working groups to represent the affiliate common interests and the medical device industry, as appropriate to their affiliation scheme.
- (b) Participation in the promotion, sponsorship, teaching and dissemination of the activities developed by AMID on each of the topics that focus on the medical device industry established in the country.
- (c) Actively participate with suggestions and comments to update the Codes provisions.
- (d) Submit complaints or denunciations against any partner, associate or business intermediary that infringes or fails to perform the Codes, as established in the Procedure.

CHAPTER 3

ASSOCIATES LIABILITIES

All Associates agree to perform the following obligations:

- (a) Conduct business and commercial activities in full attachment for Integrity values **and Honesty** with a special emphasis on avoiding and preventing corruption of any aspects, reason why it is strictly prohibited to perform conducts on their own or through a third party tending to promise, authorize or deliver any type of material or immaterial value to any natural person or company, public or private, national or international in exchange for obtaining a benefit or undue advantage.
- (b) **Promote the Integrity and Honesty culture** in their respective organizations by creating a robust compliance program incorporating the values described above, seeking to implement Codes of Conduct that include clear obligations to combat corruption and promote an ethical and transparent business culture.

(c) Implement **policies and controls** that ensure timely attachment for Integrity and Honesty values embodied. Above policies must have procedures and controls that allow guidelines verification and compliance degree, as well as sanctions or clear and determined consequences in case of its provisions violation.

(d) There must be **an independent internal body in** charge of overseeing compliance with the company's policies, as well as a whistleblowing channel to raise concerns about potential deviations from company policies or violations of the law.

(e) Boast **Compliance Program directed to its Commercial Intermediaries** in order to ensure that they perform the provisions of this Code, especially those related to corrupt practices and other illegal conducts prevention.

(f) Contribute financially with the membership fee and any extraordinary fee defined by the Directors Board.

(g) Abide by and perform the resolutions and / or sanctions determined by the Review Group in an infringement case.

(h) Adjust your commercial activity to the Codes' guidelines and implement the needed controls to guarantee that your organization, company or companies; as well as the commercial intermediaries they relate with and perform the codes provisions.

(i) Monitor that resources destined to promotion, organization and performance of academic activities and social work, are delivered according to the Codes.

(j) Observe the applicable legal provisions where they carry out any of their activities, urging them to apply norms and standards international values in the human rights areas, labour standards, environment and anti-corruption protection and conservation.

(k) Ensure that marketed medical devices are safe, effective and fulfil the necessary quality through compliance with applicable health regulations.

(l) Implement the needed mechanisms to ensure their responsible actions in the sponsorship, donation, promotional, among other activities, under the Interaction Code.

(m) Self-conduct in a respectful way and avoid any affectedness in another associate's image.

(n) To keep confidentiality about generated and accessed AMID information, under the AMID Board and Committees work guidelines.

(o) Avoid all those practices, covenants, agreements that have the effect or diminishing object, obstruction or impediment or that generate constraints to free concurrence or economic competition among economic agents.

(p) Avoid and / or minimize harmful effects for the community, the environment and natural resources (renewable and non-renewable), protecting the community health, safety and integrity in general.

(q) Avoid any type of discrimination situations.

(r) Disseminate and train all the associate's employees and their commercial intermediaries regarding the Codes seeking compliance.

This Code version will be subject to revision at least every two years.

This Code may not be modified or altered in whole or in part, unless the modifications mentioned are in writing and accepted by the AMID members, according to bylaws.

The associates will sign a communication document every year during the first quarter of each calendar year, subscribing their commitment to the code's observance. Likewise, they will obtain from their commercial intermediaries an endorsement with the aforementioned commitment. The lack of signature of that document will empower AMID not to renew the partner or associate's affiliation.