

INTRODUCTION

The Mexican Association of Innovative Medical Device Industries (AMID) is an association of global leaders in medical devices innovation and diagnostic systems, dedicated to advancing healthcare services in Mexico by improving access to innovations that enhance people's quality of life.

The members of AMID recognize the need to adhere to ethical standards and comply with applicable legal and regulatory provisions. This adherence lays the foundation for ensuring a level playing field among competitors affiliated with AMID, providing assurance of transparent business practices.

We firmly believe that compliance leads to sustainable business and promotes the fight against corruption.

SCOPE

The provisions of this Code are applicable to all members of AMID and are intended to establish guidelines for ethical corporate conduct. All members are required to comply with this Code of Ethics and are also responsible for ensuring that their distributors, sub-distributors, agents, sales representatives, value-added resellers, and/or channel partners (hereinafter referred to as "commercial intermediaries") who represent AMID member companies in a commercial capacity, adhere to this Code, as well as any Codes, Procedures derived from it, and any other documents issued by AMID.

PRINCIPLES

All AMID members commit to conducting their business relationships according to the following principles:

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

Independence: Relationships with Healthcare Professionals, government agencies and entities, and companies that market industry products, among others, should not be used by Members to influence or bias their commercial decisions through improper or undue advantages, avoiding any potential or actual conflict of interest. Such interactions should also remain independent of sales transactions or the use or recommendation of AMID members' products.

Legality: Agreements with Healthcare Professionals, government agencies and entities, and companies that market industry products, among others, must always comply with applicable legal provisions in areas such as economic competition, anti-corruption, and health regulation, as well as market commercial standards.

Development: Relationships with Healthcare Professionals, government agencies and entities, and companies that market industry products, among others, are intended to promote medical technology, innovation, and the care and improvement of patients' quality of life.

Transparency: AMID members must always have mechanisms in place to ensure the timely and accurate recording of their commercial transactions, both in their dealings with Healthcare Professionals, government agencies and entities, and companies that market industry products, as well as in their own transactions.

In their relationships with public servants of government agencies, entities, and state-owned enterprises, AMID members commit to conducting themselves according to the principles of legality, honesty, loyalty, impartiality, and efficiency.

CHAPTER 1

DEFINITIONS

For the purposes of this Code, the following terms shall be understood as:

- a. **AMID:** The Mexican Association of Innovative Medical Device Industries, A.C.
- b. **Members:** All legal entities that make up AMID through an agreement of the Association's Board of Directors.
- c. **Code of Interaction:** The current Code of Interaction with Healthcare Professionals.
- d. **Ethics Committee:** The body responsible for promoting a culture of strict and impartial adherence to ethical standards at all times, as well as for applying and interpreting the provisions of this Code in relation to the conduct of Members.
- e. **Conflict of Interest:** Any potential or actual situation where the personal, family, or business interests of one or more Members may affect the impartiality of their behavior or relationships in their commercial activities.
- f. **Executive Director:** The person who will safeguard the interests of the association, appointed by the Board of Directors, with their functions defined according to the employment contract.
- g. **Compliance Review Group:** The oversight body of the Association in matters of compliance, consisting of at least three members, including an honorary member. The members of the Review Group will be appointed by the Executive Directorate, always seeking to avoid conflicts of interest.
- h. **Industry:** All legal entities that make up the innovative medical device industry established in the country.
- i. **The Codes:** All current AMID codes.
- j. **Procedure:** The Procedure for Complaints and Reports of Non-Compliance with AMID's Current Codes.

CHAPTER 2

MEMBERS' RIGHTS

Members shall enjoy the following rights:

- a. To be part of the Board of Directors, Committees, and working groups to represent the common interests of the affiliate and the medical device industry, according to their membership scheme.
- b. To participate in the promotion, sponsorship, teaching, and dissemination of activities carried out by AMID concerning each of the topics related to the medical device industry established in the country.
- c. To actively contribute suggestions and comments for updating the provisions of the Codes.
- d. To file complaints or reports against any member, associate, or commercial intermediary who violates or fails to comply with the Codes, as established in the Procedure.

CHAPTER 3

MEMBERS' OBLIGATIONS

All Members commit to fulfilling the following obligations:

- a. To conduct business and commercial activities in full adherence to the values of Integrity and Honesty, with a special emphasis on avoiding and preventing corruption in any form. It shall be strictly prohibited to engage in conduct, either directly or through a third party, aimed at promising, authorizing, or delivering any type of material or immaterial value to any individual or entity, public or private, national or international, in exchange for obtaining an undue benefit or advantage.
- b. To promote a culture of Integrity and Honesty within their respective organizations by creating a robust compliance program that incorporates the aforementioned values. This should include the implementation of Codes of Conduct with clear obligations aimed at combating corruption and promoting a culture of ethical and transparent business practices.
- c. To implement policies and controls that ensure timely adherence to the values of Integrity and Honesty outlined herein. These policies should include procedures and controls that allow for verification and assessment of compliance, as well as clear and determined sanctions or consequences in case of violations.
- d. To establish an independent internal body responsible for monitoring compliance with the company's policies, as well as a reporting channel that enables the raising of concerns about potential deviations from company policies or violations of the law.
- e. To maintain a Compliance Program aimed at their Commercial Intermediaries to ensure that they adhere to the provisions of this Code, particularly those related to the prevention of corrupt practices and other illegal conduct.
- f. To contribute financially by paying the membership fee and any extraordinary fees defined by the

Board of Directors.

- g.** To comply with and adhere to the resolutions and/or sanctions determined by the Compliance Review Group regarding Non-Compliance.
- h.** To align their commercial activities with the guidelines of the Codes and implement the necessary controls to ensure that their organization, company or companies, as well as the commercial intermediaries with whom they engage, comply with the provisions of these Codes.
- i.** To ensure that resources allocated for the promotion, organization, and execution of academic and social activities are distributed in accordance with the Codes.
- j.** To observe applicable legal provisions in the locations where they conduct any of their activities, and to apply international values and standards in the areas of human rights, labour standards, environmental protection, and anti-corruption.
- k.** To ensure that the medical devices they market are safe, effective, and of necessary quality by complying with applicable current health regulations.
- l.** To implement the necessary mechanisms to ensure responsible conduct in activities such as sponsorship, donations, and promotions, under the Code of Interaction.
- m.** To conduct themselves in a respectful manner and avoid any actions that could harm the reputation of another member.
- n.** To maintain confidentiality regarding information generated and accessed within AMID, in accordance with the Guidelines for the work of the Board of Directors and AMID Committees.
- o.** To avoid any practices, agreements, or arrangements that have the effect or purpose of reducing, obstructing, or impeding, or that create conditions on free competition or economic competition among economic agents.
- p.** To avoid and/or minimize harmful effects on the community, the environment, and natural resources (both renewable and non-renewable), while protecting the health, safety, and well-being of the general community.
- q.** To avoid situations of any kind of discrimination.
- r.** To disseminate and train all employees of the members and their commercial intermediaries on the Codes, ensuring their compliance.

This version of the Code will be subject to review at least every two years.

This Code may not be modified or altered in whole or in part unless such modifications are documented in writing and accepted by AMID members in accordance with the bylaws.

Members shall annually sign a communication during the first quarter of each calendar year, reaffirming their commitment to the observance of the Code. Likewise, they shall obtain a similar reaffirmation of commitment from their commercial intermediaries. Failure to sign the aforementioned communication will grant AMID the right to not renew the member's or associate's affiliation.