



Code of Conduct

Trojan Medical (Pty) Ltd. is a inspection body whose business it is to verify and assess conformity of our client's Diagnostic X-Ray Imaging Systems.

The value that Trojan Medical (Pty) Ltd. provide to our clients is trust. For this reason, Trojan Medical (Pty) Ltd. has chosen to adopt to and implement a Code of Conduct that enshrines the substance of the integrity that Trojan Medical (Pty) Ltd. stands for.

The Code of Conduct address technical and business professional conduct and ethics in relation to the following areas:

- Integrity
- Conflict of Interest
- Confidentiality and Data Protection
- Anti-bribery
- Fair Business Conduct
- Health and Safety
- Fair Labour

It is a condition of employment that personnel implement and abide by the Code of Conduct.

All personnel therefore comply with all applicable laws as well as the following rules and principles from this Code of Conduct. Top management are responsible for ensuring that all their reporting personnel are familiar with and comply with this Code of Conduct. Top management have a responsibility to act as role models in applying the principles of this Code of Conduct. Trojan Medical (Pty) Ltd. does not allow its personnel to become involved in activities that clearly aim to manipulate statutory or other regulations. All personnel may ask top management for advice if they are unsure about how to apply this code or other internal guidelines.

The term "personnel" refers to all full-time and part-time employees, top management, and members of the Board of Directors of Trojan Medical (Pty) Ltd.

1. Integrity

Trojan Medical (Pty) Ltd. and its personnel shall operate in a professional, independent and impartial manner in all its activities.

Trojan Medical (Pty) Ltd. and its personnel shall carry out its work honestly and shall not tolerate any deviation from its approved methods and procedures. Where approved inspection methods make provision for deviation in results, personnel shall ensure that such deviations are not abused to alter the actual inspection findings. Personnel shall be able to act professionally under adverse pressure from top management and clients.

Trojan Medical (Pty) Ltd. and its personnel shall report data, inspection results and other material facts in good faith and shall not improperly change them and shall only issue reports that correctly present the actual findings, professional opinions or results obtained. Personnel shall not intentionally communicate false or misleading information which may compromise the integrity of our accreditation, approval and inspection processes or decisions therein.

2. Conflict of interest

Trojan Medical (Pty) Ltd. and its personnel shall avoid conflict of interest with any related entity in which it has a financial or commercial interest and to which it is required to provide services.

Trojan Medical (Pty) Ltd. ensures that its personnel avoid conflicts of interest with all activities of Trojan Medical (Pty) Ltd. Personnel shall inform Trojan Medical (Pty) Ltd. of any business connections, interests or affiliations which might influence their judgment or impair the equitable character of their services. Personnel will not accept compensation from more than one party for the same service without the consent of all parties.

3. Confidentiality and Data Protection

Trojan Medical (Pty) Ltd. and its personnel shall respect the confidentiality and privacy of client's information and ensure processes are in place to adequately protect such information. All personnel of Trojan Medical (Pty) Ltd. are required to complete and sign a confidentiality & impartiality declaration agreement which prohibits the disclosure of any confidential business information to other parties obtained during their employment or contract. The confidentiality & impartiality declaration mandates personnel to treat in a confidential and private manner all information gained in relation to any of Trojan Medical (Pty) Ltd.'s identified activities of accreditation and inspection; unless authorized in writing to disclose such information by Trojan Medical (Pty) Ltd., and the client (when applicable), and

- not to discuss such information with anyone except those who have a need to know the information for legitimate purposes of the accreditation, approval or inspection processes;
- not to disclose any details of inspection findings, neither during nor after the inspection process.

4. Anti-bribery

Trojan Medical (Pty) Ltd. and its personnel shall prohibit the offer or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment.

Trojan Medical (Pty) Ltd. prohibit the use of any routes or channels for provision of improper benefits to, or receipt of improper benefits from, clients, agents, contractors, suppliers, employees of any such party, or government officials.

4.1. Political contributions

Trojan Medical (Pty) Ltd. and its personnel shall not make direct or indirect contributions to political parties, organisations or individuals engaged in politics, as a way of obtaining advantage in business transactions.

4.2. Charitable contributions and sponsorships

Trojan Medical (Pty) Ltd. shall ensure that charitable contributions and sponsorships are not being used as a subterfuge for bribery. Therefore Trojan Medical (Pty) Ltd. will account for all its charitable contributions or sponsorships in a separate ledger and consolidate all such payments made by Trojan Medical (Pty) Ltd.

4.3. Gifts, hospitality, and expenses

Personnel are prohibited to offer or receipt of gifts, hospitality, or expenses whenever such arrangements could affect the outcome of business transactions and are not reasonable and bona fide expenditures.



5. Fair Business Conduct

Trojan Medical (Pty) Ltd. and its personnel shall conduct itself with the highest standards and business ethics and integrity and shall not do anything which would bring its reputation, or the reputation of the diagnostic x-ray imaging systems inspection industry, into disrepute.

Personnel shall understand and adhere to the following principles governing fair business conduct:

- Personnel are prohibited making untrue statements about competitors, their operations, services, or service offerings.
- Personnel are prohibited from activities contrary to rules for fair competition, anti-trust or tendering.
- Personnel are prohibited from inciting, inducing, or encouraging any person to breach its contractual obligations (including obligations of confidentiality).
- Personnel are prohibited from commercial espionage and/or data theft.

Presentations and publications from Trojan Medical (Pty) Ltd. shall accurately and unambiguously reflect our network and affiliations, resources/capabilities, experience, and services we provide.

6. Health and Safety

Trojan Medical (Pty) Ltd. shall implement adequate training and procedures to protect the health and safety of personnel, clients, and third parties and shall monitor incidents with the view of minimising risks during business operations.

Personnel are encouraged to report any Health & Safety related incidents to the top management of Trojan Medical (Pty) Ltd. Top management are committed to record these incidents, investigate these incidents and if required, take corrective measures.

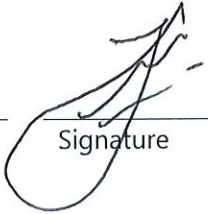
7. Fair Labour

Trojan Medical (Pty) Ltd. is aware of its social responsibility for its personnel and the people, communities, and environments in which it works and shall respect human rights.

The Board of Directors and Top Management of Trojan Medical (Pty) Ltd. is committed to the following:

- Compliance with at least the minimum wage legislation and other applicable wage and working time laws.
- Prohibition of child labour – strictly prohibit the use of child labour.
- Prohibiting of forced and compulsory labour – prohibit all forms of forced labour, whether in the form of prison labour, indentured labour, bonded labour, slave labour or any kind of non-voluntary labour.
- Respect of equal opportunities in the workplace.
- Zero tolerance of abuse, bullying or harassment in the workplace.

Approved by: M Maidman
Managing Director


Signature

24/01/2025
Date

Acknowledged by: _____
Name & Surname

Signature

Date