

# MSS Code of Ethics and Business Conduct

## Statement of Our Core Values

### MSS Vision

To be Middle East's leading consultants and solutions providers of internationally acquired high end medical products that contribute to the improvement of the medical landscape and patients' wellbeing in the region.

### Values

Excellence in Quality Products & Services Making a Difference in Surgical Ecosystem

Perseverance Openness to Progress Wellbeing of Patients Ethics, Integrity & Accountability  
Reliability, Resourcefulness & Determination.

### Mission

MSS continuously seeks cutting edge medical products and provides customized solutions and clinical training through a specialized and dedicated team of professionals.

### Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: will this build trust and credibility for MSS? Will it help create a working environment in which MSS can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering "yes" to those questions and by working every day to build our trust and credibility.

### Our Stakeholders:

- Patients and healthcare providers: Patients, healthcare providers, medical institutions are at the heart of what we do and why we exist. We strive to serve the well-being of patients in the KSA and GCC area. Credibility, accountability, innovation, honesty, reliability, trust, mutual respect and maintaining ethical standards are at the core of our mission.
- Employees: As a company that values integrity, we expect our employees to be honest, accountable, fair, responsible, to uphold our values and ensure our continued success.
- The Company: Everyone at MSS, from Leadership to all employees must have the best interest of the company in mind. We have to make sure that the reputation, image, premises, values, assets and intellectual properties are protected and preserved responsibly and with the utmost integrity.

- **Suppliers and regulators:** As MSS operates in a volatile and dynamic environment, we need to stay vigilant and aligned with all the changes that are affecting the medical device industry from the supplier and regulatory aspect.
- **Community:** We believe in maintaining and promoting better quality of life and the welfare of the communities where we live, operate and serve. We are committed to minimizing damage to the environment, the safety of our employees, the customer and the public.

## **Respect for the Individual**

MSS is an equal employment employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

## **Inclusive Workplace**

All MSS employees are also expected to support an inclusive workplace by adhering to the following conduct standards:

- Treat others with dignity and respect at all times.
- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive or unwelcome.
- Foster teamwork and employee participation.
- Avoid slang that might not translate across cultures.
- Support flexible work arrangements for co-workers with different needs, abilities and/or obligations.
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct.

MSS will not tolerate discrimination, harassment or any behavior or language that is abusive, offensive, or unwelcome.

## **Create a Culture of Open and Honest Communication**

At MSS everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions.

MSS will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action.

## **Uphold the Law**

MSS commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles.

## Avoid Conflicts of Interest

### Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of MSS may conflict with our own personal or family interests.

Here are some other ways in which conflicts of interest could arise:

1. Hiring or supervising family members or closely related persons.
2. Having a substantial interest in a competitor, supplier or contractor.
3. Having a personal interest, financial interest or potential gain in any MSS transaction.
4. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all MSS employees.

Employees with a conflict of interest question should seek advice from management

## Confidential and Proprietary Information

Integral to MSS business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors.

## Use of Company Assets

Company's assets are understood as the tangible property (computers, mobile phone, pass cards, desks, printers, photocopies, etc) and intellectual property. This includes all office premises, furniture, equipment and consumables, as well as IT systems and other technological assets and confidential information.

- Employees may only use company property and resources for their intended purpose; they may not be used for personal reasons. All cases of wasting, misusing, destroying or mishandling company property or engaging in unusual or illegal activities must be immediately brought to the attention of senior management and/or Human Resources.
- All employees, mid and top-level managers should do their best to protect the company's assets and ensure their effective usage. Incidents of theft, negligence and wastefulness are not tolerated and will be addressed with severe disciplinary action and responsible employees will be held personally liable for covering the cost of replacing or repairing the item.
- Employees should use IT systems only for business purposes, using email or the internet for personal, non-business purposes is prohibited during working time.
- Excessive personal usage of telephones is not permitted.

- ☐ Severe measures will be undertaken to address mishandling or using excessive force on any fixed asset. In such case, the employee will be held personally responsible for any repairs and will be subject for a warning.

It is the individual responsibility of all employees to:

- ☐ Never remove property from the company's premises without any permission.
  - ☐ Keep working, break and staff amenity areas clean and tidy.
  - ☐ •Care, safeguard and maintain MSS property.
  - ☐ Be mindful and responsible use of electricity and water on the premises.
  - ☐ Protect shared facilities.
  - ☐ Remove paper containing sensitive or classified information from printers and boxes.
  - ☐ Handle company assets responsibly and with care.
  - ☐ Abide by the telephone etiquette and use low tone when talking on the mobile phone to maintain a professional image.
- Commitment to refrain from inciting any employee in a manner that compromises the company's interests or disrupts its established procedures for the proper functioning of work.

### **Office cleanliness**

Every office needs to have a clean work environment. All employees, including executives, managers, and frontline workers, must make an effort to keep the workplace organized, clean, and tidy. The standard cleanliness rules at MSS are:

- ☐ Maintain a tidy and organized workspace.
  - ☐ Declutter your work area and common space If you find them disordered.
  - ☐ Make sure the electrical wiring and cords are bundled up properly.
  - ☐ Boxes, bags, and other stuff should not block the hallways, fire exits, or doorways.
  - ☐ Throw the food wrappers in suitable bins.
  - ☐ At the end of the day, take out the unconsumed food and similar stuff from the office fridge.
- Littering of any kind is strictly prohibited in all office areas. This includes depositing rubbish, wrappers, liquids or any other type of waste in undesignated places. Toilets must be kept clean and tidy at all times.

### **Prayer area**

Staff members are expected to use designated ablution (wudu) and prayer areas. Assigned male and female area spaces are allocated for that purpose on the first floor. Maintaining the cleanliness of these areas is a must and premises will be regularly inspected.

### **Office Boy Responsibilities**

The function of Tea Boy is not available in the new offices. All employees are invited to visit the kitchen area to cater for their personal needs. That will be a great opportunity to have a walk away from the office and a chance to socialize with colleagues.

Office boys available will be responsible for office cleaning and maintenance only.

### **Accountability**

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. Managers are responsible for their employees' abiding by this code of conduct and in case of a breach, they will be held personally responsible and accountable for their employees' behavior.

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department.

MSS takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

**All personnel who fail to follow this code of conduct will face disciplinary action up to and including dismissal from service without notice depending on the severity of the violation.**

CEO

Fadi Mahmoud

Human Resources Department