

Code of Conduct





At Infermedica, our values—Transparency, Trust, Quality, and Courage—are the cornerstone of everything we do. They shape our decision-making processes, influence our interactions, and define the behaviors we wish to promote. By adhering to our Code of Conduct, we can create a cohesive and respectful workplace where everyone feels valued and empowered to contribute their best.

Our Code of Conduct is not just a set of rules; it is a reflection of our shared values and a commitment to uphold them in all our actions. By following this guide, we ensure that Infermedica remains a place where integrity, respect, and excellence are not just goals, but everyday practices. Together, we can achieve great things and continue to make a meaningful impact in the healthcare industry.

Piotr Orzechowski
Chief Executive Officer

Table of contents

Purpose of Infermedica Code of Conduct	4	Anti-bribery	13
Values	5	Environmental Obligations	14
Fair Employment	6	Confidentiality and Intellectual Property	15
Equality, diversity, and inclusion	8	Product quality and safety	16
Fair competition	9	Whistleblowing	17
Conflict of Interest	10	Human rights	18
Anti-money laundering and vendor verification	12		

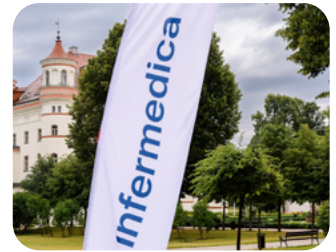
Purpose of Infermedica Code of Conduct

Our Code of Conduct helps all team members understand how to behave correctly. It is a framework for support if we need clarification. We can only envision and prepare for some business situations that may pose an ethical dilemma. Accordingly, we do not claim that this document is definitive or exhaustive.

All Infermedica's personnel must adhere to the principles described in this Code of Conduct and meet its requirements. It includes part-time employees, those employed under civil law contracts, and temporary workers. If you are a manager or supervise the work of others, you have a particular responsibility. You must lead by example and act by this Code of Conduct.

Our Code of Conduct does not rule out the need to exercise sound judgment but instead helps us to do the right thing. When in doubt, you should ask yourself the following questions:

If the answer to even one of these questions is "no," it is probably not the right thing to do—in-
stead, dialogue with your team manager, Compliance Officer, or P&C to make the appropriate decision.



- Does it feel right?
- Is it aligned with Infermedica Values, Code of Conduct, and other company policies?
- Can I explain it to fellow team members, team managers, clients, family, or, externally, to the press?
- Is it legal?

Values

Our Code of Conduct connects deeply to our values. Values guide us in making consistent decisions and help us attract individuals who resonate with our mission. Values also encourage the development of desired behaviors within Infermedica. Our Values are:

Courage

Courage is essential as we pioneer groundbreaking innovations in our field. By fearlessly exploring new horizons and pushing the boundaries of what's possible, we encourage our team to take bold steps toward progress

Quality

Quality is visible in our every activity, as we build medical-grade products that are already used by hundreds of thousands of patients every month. As our product is a certified medical device, we are under a regulatory obligation to maintain the highest quality standards.

Trust

Trusting each other brings us much closer to achieving Infermedica's mission. It is valuable in establishing long-lasting partnerships and creates space for developing each other and the company.

Transparency

Transparency creates space for trust and healthy relationships at Infermedica. The more we know, the better we can adapt to changes and find solutions together.



Fair Employment

We have a zero-tolerance policy towards harassment, which is improper or unwanted conduct that may or may not be sexual or otherwise related to a protected characteristic that is intended to or does violate the dignity of another person or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Infermedica does not tolerate mobbing, which may include any unwanted behavior that is offensive, intimidating, malicious, or insulting or is an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm.

We do not accept abusive micro-behaviors such as comments, questions, or offensive or inappropriate behaviors and communicate a hostile, derogatory, or

harmful attitude towards somebody else, whether or not intentional. Such behaviors could involve excluding people from activities, persistently interrupting colleagues, taking credit for the work of others, repeatedly disregarding the non-working time of others, or other detrimental treatment, whether or not related to a protected characteristic.

All the decisions related to someone's engagement with Infermedica (regardless of the form of cooperation and engagement) shall be based on merit, principles of equal opportunity, or made for other legitimate business reasons.

All our employees should receive appropriate remuneration for their work and be treated fairly and with respect for their labor rights. The working environment

should maintain dignified conditions. We demand that these conditions be fulfilled, as defined by the internal regulations, European Union legislation, and the International Labour Organization (ILO) standards.

We do not tolerate any forms of child labor, forced or compulsory labor, including practices such as unlawful or unauthorized deductions from wages or any form of modern slavery, in all jurisdictions and territories where Infermedica operates. Infermedica condemns such

practices and will comply with any national or international regulation that aims to prevent such behavior.

We do not allow practices restricting employees' freedom of movement, such as confiscating identity documents or work permits as a condition of employment. We maintain an ongoing dialogue with our personnel to ensure their rights are respected.

WHAT DOES IT MEAN FOR YOU?

→ I have the right to be treated with respect and dignity. At the same time, I shall respect the dignity, privacy, and rights of every person you encounter and all those affected by our business activities.

→ I should report any concerns if I become aware of any undignified working conditions at Infermedica, or any of Infermedica's vendors. I know that I can do it anonymously if I am concerned that such report can be used against me.



Equality, diversity, and inclusion

Diversity encompasses how we differ as individuals, such as age, gender, sexual orientation, ethnic background, generational affiliation, religion, beliefs, language, education, and marital status.

Inclusion means valuing and promoting the wealth of unique ideas, viewpoints, perspectives, and opinions from a group's diverse members.

We do not tolerate disrespect, harassment, discrimination, mobbing, or unwanted sexual advances. We create an open environment for everyone.

Infermedica neither collects any information about our personnel nor asks for such information to be disclosed.



WHAT DOES IT MEAN FOR YOU?

- I assess fellow team members based on professional competence, behavior, and achievements.
- I do not make or tolerate jokes, language, gestures, or other behavior that may offend people, make them feel discriminated against, or create a hostile environment.
- I cooperate with my colleagues irrespective of social, cultural, ethnic, or national origins, religious or other beliefs, gender identity/expression, marital status, pregnancy status, sexual orientation, disability, age, skin color, race, parental status, or political ideology.



Fair competition

We are committed to conducting business activities that support fair and open competition and adhere to honest and transparent business practices. Our personnel is informed of the competition laws and their obligations under the fair competition policy to ensure they are aware of the non-compliance risks and the relevant legislation. We maintain accurate records of

all business-related communications and agreements to ensure transparency and compliance. We require our personnel to comply with all applicable competition and antitrust laws in all my business dealings. You should avoid engaging in agreements or practices that may interfere with free market competition, such as price-fixing, bid-rigging, or market allocation.

WHAT DOES IT MEAN FOR YOU?

- You will ensure that you are not engaged in any discussions or agreements with competitors regarding prices, terms of sale, market division, or other commercially sensitive information.
- You will treat all customers, suppliers, agents, and resellers fairly and transparently, honestly promoting our products and services without misrepresenting their quality or features.



Conflict of Interest

Conflicts of interest arise when our interests conflict with our duties as employees or representatives of Infermedica. Even the slight appearance of a conflict of interest can be as harmful as an actual conflict. Conflict of interest can sometimes be hard to identify. Here are some examples of what it can mean:

Example 1

You are responsible for hiring new staff, and you decide to hire a close friend or family member even when there are more suitable candidates. This relationship may affect your objectivity in hiring based on qualifications and merit.

Example 2

You have a significant financial interest in a supplier or vendor that does business with Infermedica. This may influence your decisions when selecting suppliers, leading to biased decision-making that favors your personal financial gain.

Example 3

A manager is involved in a project that could significantly benefit his personal investments or assets. Their decision-making may be influenced by the potential personal financial gain rather than the best interests of Infermedica.

We must be careful not to take actions that may conflict with Infermedica's interests or could lead to damaging its reputation. We are accountable to our stakehold-

ers for making decisions without considering personal benefits.

WHAT DOES IT MEAN FOR YOU?

- I must not engage in outside activities that compete with Infermedica.
- I must report any potential conflict of interest to my team manager or Compliance Officer.
- I must award business solely based on merit and not because of personal relationships or potential personal gain.
- I must not use or disclose any business information or opportunities obtained through my work for personal advantage or personal gain.
- If I am still determining whether my interest creates a potential conflict of interest, I should discuss the matter with my team manager or Legal.



Anti-money laundering and vendor verification

Infermedica voluntarily commits to implement and enforce anti-money laundering (AML) verifications to protect the company from being used for money laundering or terrorist financing. We ensure that our AML policies comply with applicable laws in all jurisdictions where we operate.

We may conduct risk assessments to identify and mitigate the risks of money laundering and terrorist financing associated with our business activities. We update our risk assessments as necessary, mainly when there

are changes in risk factors related to our cooperators, geographic areas, or types of transactions. In terms of vendor verification, we apply due diligence measures to identify and verify the identities of our cooperators. We ensure that due diligence is conducted before establishing any business relationship and that it is updated as needed.

We promptly notify appropriate authorities of any circumstances that indicate a suspicion of money laundering or terrorist financing.

WHAT DOES IT MEAN FOR YOU?

- I will not engage in or facilitate any activities construed as money laundering or terrorist financing.
- I am responsible for knowing, understanding, and complying with the AML Policy, adhering to all relevant laws and regulations in all my business activities, and completing training.
- I am responsible for seeking help from the Legal department if and when I have any questions or doubts about complying with the AML Policy.



Anti-bribery

We commit to conducting business ethically and honestly, with zero tolerance for bribery and corruption. We aim to identify and mitigate the risk of bribery and ensure compliance with all relevant anti-bribery laws, including the FCPA, UK Anti-Bribery Act, and Polish Anti-Bribery provisions.

We have clear guidelines on acceptable gifts and hospitality, ensuring they are given or received without corrupt intent and within permissible limits. We prohibit

giving gifts or hospitality to public officials and ensure all gifts and hospitality are transparent and compliant with applicable laws.

We do not make or accept facilitation payments or kickbacks, recognizing them as corrupt practices.

We do not support political parties or candidates, avoiding any perception of attempting to gain improper business advantage.

WHAT DOES IT MEAN FOR YOU?

- Under no circumstances shall I demand or accept bribes. I shall not give or offer bribes, nor shall I accept the fact of their transfer—directly or indirectly. This means, among other things, that I shall never attempt to bribe a public official, including a foreign public official or any person or entity, nor shall I improperly influence them.
- I will not offer or make bribes to speed up or secure any process, and I will not let anyone else make such offers or payments for me.
- I shall ensure that intermediaries are always used with fair business practices, that their fees are always appropriate for the services performed, and that they are properly documented, with documents stored as required.
- I shall not use charitable donations or sponsorships to circumvent the provisions of our Code of Conduct or Infermedica's Anti-Bribery Policy.



Environmental Obligations

We commit to reducing our environmental impact by promoting sustainable business practices, such as reducing travel, encouraging the use of bicycles, and minimizing paper usage. We ensure that most document archiving is conducted electronically and promote the use of electronic signatures for contracts to reduce paper waste. Infermedica is a remote-first company. We provide resources for remote work to reduce our carbon footprint and facilitate environmentally friendly practices among our personnel. Our infrastructure is cloud-based. We choose vendors who aim to achieve net-zero emissions and carbon-free energy when providing services to us.

Since our product is software, by focusing on digital products and leveraging technologies that reduce the need for physical resources and transportation, software development inherently has a smaller environmental footprint compared to many traditional industries.

We are dedicated to creating a socially responsible workplace that respects the rights and well-being of all personnel. We offer comprehensive benefits, including health care, sports cards, language learning platforms, and annual training budgets to support our personnel's personal and professional development. We actively participate in social initiatives, such as helping refugees and responding to global crises like the COVID-19 pandemic. We ensure compliance with labor laws and condemn any form of child labor, forced labor, modern slavery, or human trafficking. We conduct due diligence to prevent such practices in our supply chain.

We strive to maintain high standards of corporate governance, ensuring transparency and integrity in our internal and external communications. We regularly update our compliance management systems and rules to support sustainable development and ensure compliance with legal and ethical standards.

WHAT DOES IT MEAN FOR YOU?

- I will take the time to fully understand the environmental risks and impacts associated with my daily work and actively seek opportunities to reduce them. This includes minimizing waste and carbon dioxide production and reducing energy consumption, water, materials, and other resources.



Confidentiality and Intellectual Property

Infermedica's intellectual property—which includes software, other copyrighted materials, know-how, trade secrets, brands, and trademarks—is among its most valuable assets. We protect it and follow Infermedica's classification and handling guidelines for confidential information.

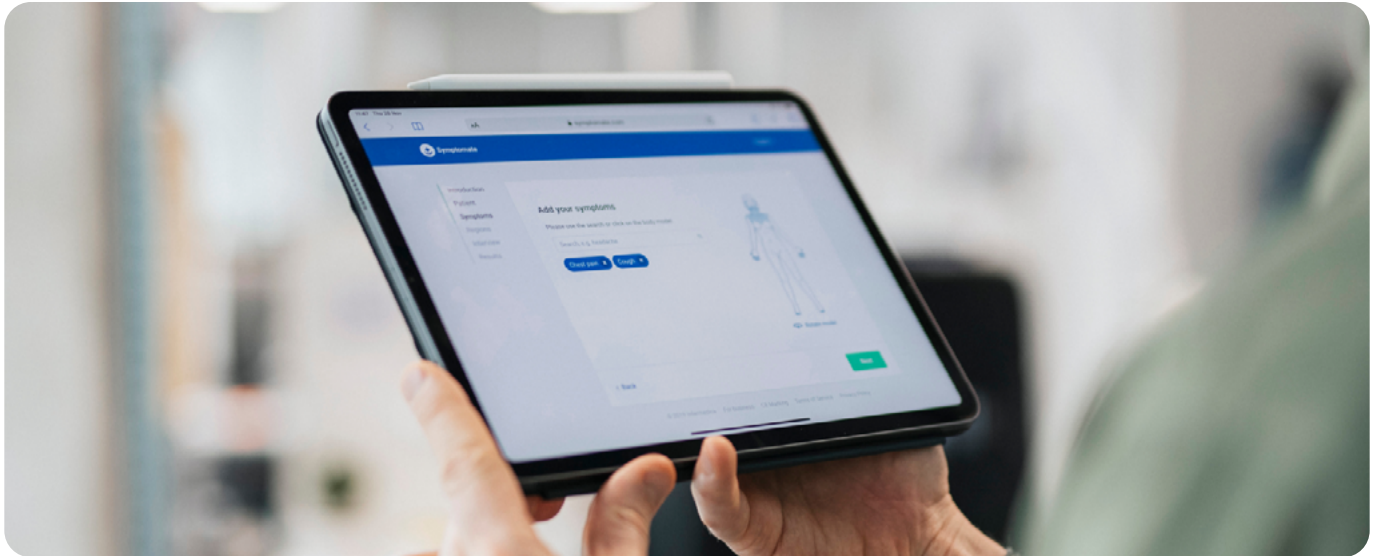
We do not use confidential information, including information recorded in electronic form, from previous employers, or from any other source to which we do not have adequate rights. We protect and safeguard commercial, technical, or scientific information about Infermedica, the disclosure of which could harm Infermedica. We prevent their disclosure or use by unauthorized persons. We protect and safeguard the confidential information our customers and business partners pro-

vide in the same manner. We do not use any products of third party's intellectual creativity manifesting in any form to which we do not have adequate rights.

Our Medical Knowledge Base, which is the basis of AI engine used in our products, was developed by physicians. We rely on highly recognizable and acceptable sources such as the British Medical Journal Best Practice, The New England Journal of Medicine, The Lancet, ClinicalKey Medical Education, UpToDate. The base also includes guidelines and publications from specialized agencies and organizations operating globally (WHO, CDC) as well as numerous medical papers with a high impact factor (NEJM, The Lancet).

WHAT DOES IT MEAN FOR YOU?

- I do not use, store, or share confidential information without appropriate authorization.
- I protect confidential information from loss or theft, which includes safeguarding portable computing devices such as laptops and tablets.
- If I receive confidential information by mistake—whether from an external business partner, colleague, client, competitor, or anyone else—I must contact the sender, disclose the situation to my manager, and not use the information gained in this way. I must also notify the General Counsel and Data Protection Officer.
- I must understand the concept of intellectual property.
- I must ensure I correctly use any intellectual property owned by Infermedica or any third party.



Product quality and safety

Infermedica is responsible towards clients and any of the end-users of our software for the quality, safety, and unobstructed access to the products and services we manufacture. We take care of it at every stage of development, production, storage, and sale. We want all employees to feel responsible for the safety and quality of products and, through their everyday actions, contribute to compliance with the standards in

this respect.

As a producer of software as a medical device, we need to apply the highest standards that are put on us in accordance with the European Union regulations. We are ISO 13485:2016 certified, and all personnel must comply with the quality management system and its requirements.

WHAT DOES IT MEAN FOR YOU?

→ I should know my obligations and responsibilities regarding the quality of Infermedica's products.

→ I should know how to avoid situations that may affect the quality and safety of Infermedica's products.

Whistleblowing

Infermedica is responsible towards clients and any of the end-users of our software for the quality, safety, and unobstructed access to the products and services we manufacture. We take care of it at every stage of development, production, storage, and sale. We want all employees to feel responsible for the safety and quality of products and, through their everyday actions, contribute to compliance with the standards in

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WHAT DOES IT MEAN FOR YOU?

- I should know how to access the internal whistleblowing channel to report the violation to the Compliance Officer.
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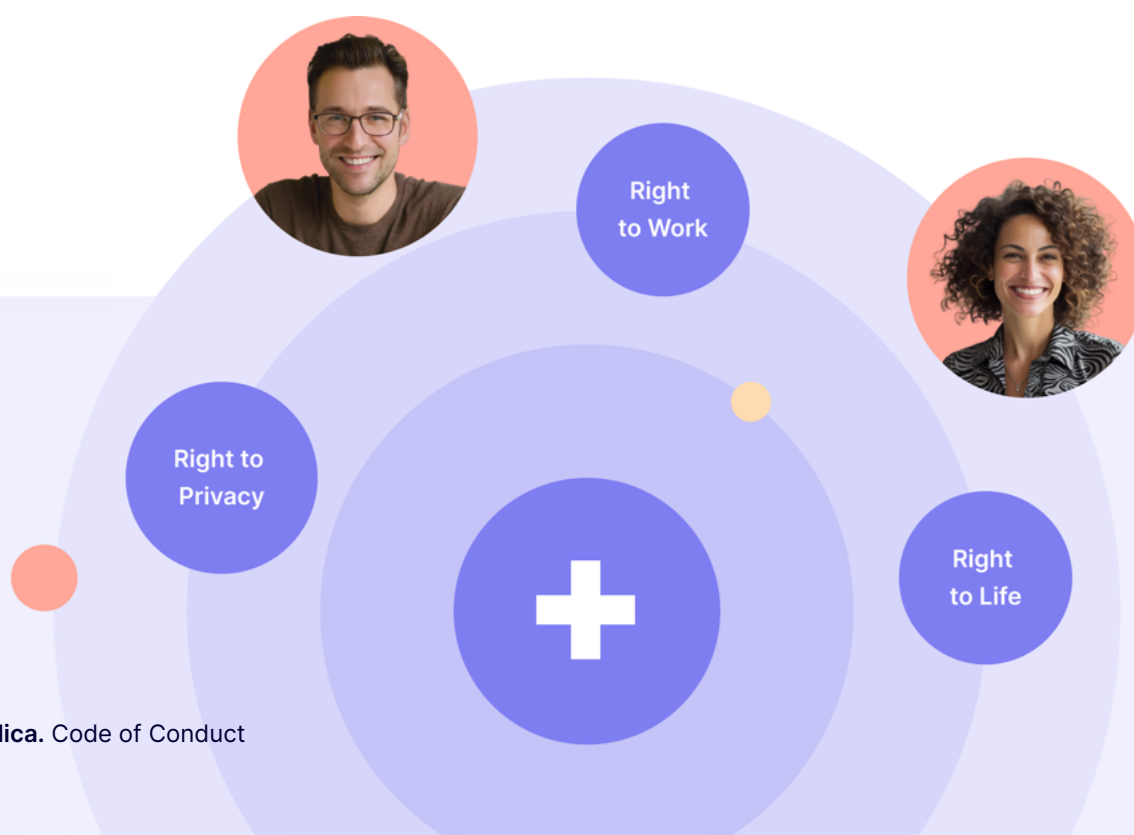
Human rights

Our Code of Conduct is aligned with the following rights. This list is not exhaustive, and Infermedica is committed to protecting the human rights of all people affected by our activities.

- Right to Life (UDHR art. 3, ICCPR art. 6)
- Right to Health Protection (ICESCR art. 12)
- Right to Work (UDHR art. 23, ICESCR art. 6)
- Right to Just and Favorable Working Conditions (UDHR art. 23, art. 24, ICESCR art. 7, ILO: Convention No. 100, Convention No. 155, Convention No. 1 and 30)
- Right to Freedom from Torture, Cruel, Inhuman, and/or Degrading Treatment or Punishment (UDHR art. 5, ICCPR art. 7)
- Minority Rights (ICCPR art. 27)
- Right to Privacy (UDHR art. 12, ICCPR art. 17)
- Right to Freedom from Slavery, Servitude, and Forced Labor (UDHR art. 4, ICCPR art. 8, ILO: Convention No. 29 and Protocol of 2014, Global Compact)
- Right to Equal Treatment by Law, Equal Legal Protection, and Freedom from Discrimination (UDHR art. 7, ICCPR art. 26, ILO: Convention No. 111, Global Compact Principle No. 6)

Abbreviations:

- UDHR: Universal Declaration of Human Rights
- ICCPR: International Covenant on Civil and Political Rights
- ICESCR: International Covenant on Economic, Social, and Cultural Rights
- ILO: International Labour Organization



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