

GLOBAL CODE OF CONDUCT AND ETHICS POLICY

I. BACKGROUND

The Board of Directors (“**Board**”) of OmniActive Health Technologies Limited (“**OmniActive**”) adopted this Global Code of Conduct and Ethics Policy (“**Code of Conduct**”) in a meeting held on 23rd March 2021. For the purposes of this Code of Conduct, the “**Company**” includes OmniActive and majority owned subsidiaries.

This Code of Conduct is based on three (3) important principles of corporate behavior: (i) good corporate governance; (ii) good corporate citizenship; and (iii) exemplary personal conduct. The Code of Conduct shall be posted on the Company’s website.

II. APPLICABILITY

Every member of the Company including all employees, officers, consultants, agents, subcontractors, distributors, vendors, and service providers, must comply with this Code of Conduct.

III. COMPLIANCE WITH LAWS, RULES, AND REGULATIONS

Acting ethically and obeying the law, both in letter and spirit, are among the Company’s core values. We expect employees and consultants to understand the legal and regulatory requirements applicable to their area of responsibility, including federal, state, and foreign laws, as well as the relevant regulatory schemes. All employees are also expected to act with integrity and to exercise good judgment and common sense in their efforts to comply with all applicable laws, rules, and regulations, and are encouraged to ask the Chief Human Resource Officer for advice when they are uncertain about them.

We also believe every employee is responsible for becoming familiar with the Company’s policies so that they may integrate them into every aspect of our business. The Company considers violations of law, the Company’s policies, and this Code of Conduct to be serious matters. Any violation may subject an employee to disciplinary action, up to and including, termination of employment. Additionally, those who work with us, including contractors, consultants, volunteers, and their representatives, are expected to maintain professional conduct and follow this Code of Conduct (to the extent practical) and all applicable laws and regulations.

Certain violations may be referred to legal authorities for investigation and civil or criminal prosecution. If you become aware of the violation of any law by the Company, whether by its officers, employees, or any third-party doing business on behalf of the Company, it is your responsibility to promptly report the matter in accordance with the Company’s Global Whistleblower Policy. While the Company strives to address matters internally, nothing in this Code of Conduct should discourage you from reporting illegal activity, including any violation of

law, whether federal, state, local, or foreign, to the appropriate regulatory authority. This Code of Conduct should not be construed to prohibit employees from testifying, participating, or otherwise assisting in any state or federal administrative, judicial or legislative proceeding or investigation.

IV. ADDRESSING CONDUCT THAT IS HARMFUL TO OUR CULTURE AND VALUES

The Company respects the rights of all employees to express themselves. We believe open dialogue and free expression of ideas is critical to our business; however, the Company will take all reasonable and appropriate steps to address situations in which an employee's conduct or speech endangers the safety of others, violates others' rights to be free from harassment, discrimination, and retaliation, or otherwise conflicts with the Company's culture and values, up to and including, termination of employment.

V. DIVERSITY AND EQUAL OPPORTUNITY

The Company is an equal opportunity provider and does not discriminate against any person because of his/her gender, caste, religion, age (within statutory limits), marital status, nationality, ancestry, ethnicity, geographical origin, sexual orientation, disability or any other trait protected by applicable law, with respect to any terms of employment such as hiring, promotion, transfer, compensation & benefits, career development opportunities, etc. It is expected that all Company supervisors/managers shall make employment-related decisions based only on the merit of the person and not discriminate against any person because of his/her personal characteristics/traits.

All employees are expected to demonstrate respect and trustworthy behavior in their dealings with other employees as well as external stakeholders.

VI. HONEST AND ETHICAL CONDUCT AND FAIR DEALING

The Company employees should endeavor to act honestly, ethically, and fairly in both internal and external dealings, including in interactions with co-workers, limited partners, portfolio companies, service providers, and any other third parties with which the Company may conduct business. Statements regarding the Company's business must not be untrue, misleading, deceptive, or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice. Employees also are prohibited from creating or submitting false, inaccurate, or misleading invoices, receipts, or other financial or business-related documents to the Company or related businesses.

VII. GIFTS FROM SUPPLIERS AND CUSTOMERS

Employees should deal honestly and fairly with suppliers, customers, competitors and employees and should award Company business on the basis of quality, delivery, service and competitive pricing. To avoid the appearance of improper influence, no employee or member of an employee's immediate family, should accept any gift of more than a token value, in connection with the Company's commercial relationships with third parties. Neither is it appropriate to accept loans or unusual hospitality (excesses in meal, refreshment or entertainment) from the Company's suppliers or customers. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

VIII. CONFLICTS OF INTERESTS/CORPORATE OPPORTUNITIES

The Company expects all employees to conduct themselves and Company business in a manner that reflects the highest standards of ethical conduct, and in accordance with all federal, state, and local laws and regulations. This includes avoiding real and potential conflicts of interests.

Exactly what constitutes a conflict of interest or an unethical business practice is both a moral and a legal question. The Company recognizes and respects the individual employee's right to engage in activities outside of employment which are private in nature and do not in any way conflict with or reflect poorly on the Company.

It is not possible to define all the circumstances and relationships that might create a conflict of interest. If a situation arises where there is a potential conflict of interest, the employee should discuss this with a manager and/or the Company's Chief Human Resource Officer for advice and guidance on how to proceed. The list below suggests some of the types of activity that indicate improper behavior, unacceptable personal integrity, or unacceptable ethics:

- Simultaneous employment by a competitor or supplier to the Company.
- Carrying on Company business with a firm in which the employee, or a close relative of the employee, has a substantial ownership or interest.
- Holding a substantial interest in, or participating in the management of, a firm to which the Company makes sales or from which it makes purchases.
- Borrowing money from customers or firms, other than recognized loan institutions, from which the Company buys services, materials, equipment, or supplies.
- Accepting substantial gifts or excessive entertainment from an outside organization or agency.
- Speculating or dealing in materials, equipment, supplies, services, or property purchased by the Company.
- Participating in civic or professional organization activities in a manner that divulges confidential Company information.

- Misusing privileged information or revealing confidential data to outsiders.
- Using one's position in the Company or knowledge of its affairs for personal gains.
- Engaging in practices or procedures that violate antitrust laws, commercial bribery laws, copyright laws, discrimination laws, campaign contribution laws, or other laws regulating the conduct of the Company's business.

IX. HEALTH, SAFETY AND ENVIRONMENT

The Company and the Employees shall strive to provide a safe and healthy working environment and comply, in the conduct of its business affairs, with all regulations regarding the preservation of the environment of the territory it operates in. We all want a safe and healthy workplace, just like our customers want safe, high-quality products. We consider safety to be the driving force behind everything we do as a Company. Quality and safety are foundational commitments, never compromised. The Employees shall be committed to prevent the wasteful use of natural resources and minimize any hazardous impact of the development, production, use and disposal of any of its products and services on the ecological environment.

X. CONFIDENTIAL INFORMATION

Trade secrets and other proprietary information about the Company, its business activities and its customers and suppliers should be treated as confidential. Except to the extent legally required, such information or confidential employee data, should not be disclosed to people inside or outside the Company who do not have a legitimate work-related need to know. Any such disclosure must be made in accordance with the Company policies and any applicable law, including all privacy laws relating to the protection and disclosure of personal data.

In addition to the proper use of information, it is important for employees to prevent misuse or disclosure or destruction (other than in accordance with appropriate record retention policy) of the information for which they are responsible. This information may be in printed form, computer based, or stored on microfilm or stored in some other format. In handling the Company's information owned by a third party and/or licensed by the Company, employees should comply with copyright laws, computer software, licensing agreements and relevant Company policy.

XI. Anti-Corruption & Bribery

Corruption can harm communities, cause damage to our reputation, and disrupt markets. That's why we're committed to winning customers and business based on the merit of our products and never because of bribery or other illegal activity. We prohibit bribery of any kind and in any form. An improper payment to gain advantage in any business situation is never acceptable and could expose you and the Company to criminal sanctions and/or civil liability pursuant to national, state, and local anti-bribery laws. Special care is required when dealing directly or indirectly with

Government Officials or Public Official (which includes employees of state-owned enterprises) because of special laws and considerations apply to providing things of value to such officials.

For further details, please refer to our Anti-Bribery Policy or ask clarification in case you may have doubt from any Member of the Executive Committee.

XII. POLITICAL ACTIVITY & LOBBYING

Being involved in the political process is an important part of being a good citizen. We respect the rights of all of our employees to engage in the political process and encourage political participation. Though we respect your involvement in political activities, make sure they remain separate from your work. Know that we never reimburse anyone for political contributions or expenditures. Always:

- Engage in political activities on your own time.
- Use your own resources to further political causes, candidates, or campaigns.
- Avoid speaking on behalf of our company.
- Follow applicable laws and regulations.

XIII. SPEAKING ON BEHALF OF OUR COMPANY

COMMUNICATE RESPONSIBLY

It's easy for communications about our company to be misunderstood. That's why it's important that you refrain from speaking on our Company's behalf unless you're authorized to do so. If you ever are contacted by the media about our Company, refer them to the Corporate Communications team. The same applies to requests to participate in speaking engagements or to publish articles on behalf of our company. By following our policies, we avoid sending confusing messages or sharing inaccurate information about our Company.

We comply with laws that ensure the rights of employees to speak publicly about matters of public concern and engage in concerted activities related to the terms and conditions of employment. Nothing in our Code or our policies is intended or should be construed to interfere with or limit your legal rights.

SOCIAL MEDIA

Social media offers a great way to build relationships and exchange ideas. While we respect your right to use social media, use it in a way that's consistent with our values and policies. Follow the law and be aware that you are responsible for what you publish, so use good judgment. Understand that we never tolerate the use of social media to intimidate, harass, or discriminate against fellow employees.

XIV. UNACCEPTABLE BEHAVIOR

The rules set forth below are intended to provide employees with notice of what is expected of them. Such rules, however, are not exhaustive and do not identify every type of unacceptable conduct and performance. Accordingly, employees should be aware that conduct not specifically listed below but which adversely affects or is otherwise detrimental to the interests of the Company, other employees, or customers, may also result in disciplinary action, up to and including, immediate termination of employment.

Employees may be disciplined for misconduct, including, but not limited to, the following:

- Insubordination
- Dishonesty
- Theft
- Misusing or destroying the Company's property or the property of another on the Company's premises
- Violating conflict of interest rules
- Disclosing or using confidential or proprietary information without authorization
- Falsifying or altering the Company's records, including an application for employment or time records
- Interfering with the work performance of others
- Physical altercations
- Employment of child labour
- Misuse or destruction of Company assets or Company information
- Harassment, including sexually harassing employees, customers, and third parties
- Being under the influence of, manufacturing, dispensing, distributing, using, or possessing illegal or controlled substances on the Company's property or while conducting the Company's business
- Violating safety or health rules
- Possessing a firearm or other dangerous weapon or materials on the Company's property or while conducting the Company's business
- Being convicted of a crime that indicates unfitness for the job or raises a threat to the safety or well-being of the Company, its employees, customers, or property
- Gambling on the Company's premises
- Failure to call in or report for your scheduled shift of work. An absence of seven (7) consecutive scheduled workdays without notifying your supervisor or his or her designee is job abandonment and is considered a voluntary resignation.
- Illegal substance abuse of any form while performing your duty
- Selling, distributing, possessing or encouraging others to use controlled substances.

The Company reserves the right to proceed directly to a written warning, demotion, or termination for misconduct or performance deficiency, without resort to prior disciplinary steps, when the Company deems such action appropriate.