



**HIGHRIDGE**



## **Code of Conduct**



## Message from our CEO

Integrity is fundamental at Highridge. It is ingrained in our DNA, and we make intentional efforts every day to meet a high standard of ethical conduct. From our Board of Directors to my executive leadership team to every team member at every level in the global organization, we are all responsible and accountable to this commitment.

We created this Code of Conduct (the “Highridge Code”) to define our standard and govern our conduct. More than just a document, you can think of the Highridge Code as “ethics in action.” These principles that guide our daily business are more descriptive values than prescriptive rules by which we commit to serve all of our stakeholders.

As such, while we cannot specify rules that cover every scenario, we have identified core principles and values that our team members can consider and apply when navigating gray areas of business to avoid ethical pitfalls. By being intentional about integrity, we can build a successful company that can positively impact tens of thousands of patients.

We have made the Highridge Code accessible through our corporate website, so that our internal team members, as well as external vendors, commercial partners, and customers, can see the principles and values to which we are held accountable. And we want to hear when we fall short. We are dedicated to continuous improvement and value a “speak up” culture where every voice is heard without fear of retribution.

Please review the Highridge Code and do not hesitate to reach out to our Compliance Team or through our anonymous hotline if you have any questions or concerns (see Section III for contact information).

Sincerely,

A handwritten signature in black ink that reads "Rebecca Whitney". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Rebecca Whitney  
Chief Executive Officer

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An ethical workplace is a  
great work place





# **Courage to move boundaries today so patients can thrive tomorrow.**

## **I. CORE PRINCIPLES**

### **A. Shared Accountability**

Every member of our team is responsible for upholding the highest ethical standards and fostering a respectful and inclusive environment. At Highridge, we recognize that ensuring the safety, efficacy, and reliability of our products is a shared responsibility across all levels of our organization. Every department plays a vital role in upholding the highest standards of quality, compliance and responsiveness.

We accept responsibility for our actions and decisions. All team members are expected to take ownership of their work, be answerable for the outcomes, and work to correct any errors or oversights.

### **B. Radical Responsiveness**

We commit to responding swiftly to the needs of our customers, partners, and internal and external stakeholders. Our response to inquiries, issues, or opportunities is characterized by urgency and thoroughness.

Anticipating needs and addressing them before they become problems is part of our ethos. We proactively engage with all stakeholders to ensure the highest levels of satisfaction and continued progress.

### **C. Relentless Grit**

We embody a spirit of never giving up, tackling challenges with tenacity. Our workforce is known for its determination to push through obstacles to achieve our goals.

In the face of setbacks or failures, we maintain our focus, learn from the experience, and continue with greater resolve, always aiming for long-term success.

### **D. Remarkable Results**

Our aim is not just to meet expectations but to exceed them. We strive for results that are not just satisfactory but exceptional, setting new benchmarks in performance and innovation. Whether it's through our products, services, or relationships, we seek to make positive, impactful contributions to how spine surgeons treat their patients.



## II. PRINCIPLES IN ACTION

### A. We Foster a Respectful Workplace That Values All Individuals

We believe that all team members, contractors, and stakeholders deserve to work in an environment where they are treated with dignity, fairness, and courtesy regardless of color or creed, gender or ethnicity. A respectful workplace is fundamental to our success, and it is essential to maintaining a positive, productive, and safe environment that drives innovation and meets the highest standards of professionalism.

### B. We Build Quality Products

#### Patient-Centric Design

Every step of product development prioritizes patient safety and efficacy. We aim to design devices that truly meet surgeon and patient needs to improve quality of life.

We actively seek input from expert surgeons throughout the design and development process to ensure our products address real-world issues.

#### Quality Management

We adhere to applicable regulations and quality management systems, including ISO 13485, which require consistent quality in design, supplier management, production, and post-market surveillance.

Rigorous design controls are implemented to manage the development process from concept through to commercial use, including design reviews, verification, and validation.

#### Post-Market Information

Through our active communication and collaboration with health care professionals, distributors, and others, we may become aware of information about our products once they are on the market. If this information meets the definition of a complaint, it is the responsibility of every Highridge Medical team member to report this information to the complaint handling team within two (2) business days. Complaints may be reported via the link on The Peak (our company intranet portal) or directly to [spinecomplaints@highridgemedical.com](mailto:spinecomplaints@highridgemedical.com). This ensures that we are able to evaluate and appropriately address the complaint information and that we meet our reportability timelines that are required per regulations.

A respectful workplace is  
fundamental to our success



### Regulatory Pathway

We incorporate regulatory guidelines early in the development process to ensure our devices meet all necessary standards and to preempt compliance issues.

Comprehensive and accurate documentation is maintained at every stage of development to support regulatory submissions and post-market requirements.

### Research

We strive to produce high-quality research that improves outcomes for our customers and their patients. Research performed by either internal teams or externally through grants is focused, unbiased, and compliant with all applicable regulations.

### **C. We Conduct Ethical Interactions with Healthcare Professionals**

The goal of each of Highridge's interactions with a health care professional ("HCP") is ultimately to enhance patient care. Indeed, without interactions between manufacturers like Highridge and spine surgeons, innovation, education, and patient care will suffer.

So to help protect the integrity of all of our HCP interactions, we adhere to the AdvaMedCode of Ethics on Interactions with Health Care Professionals (<https://www.advamed.org/member-center/resource-library/advamed-code-of-ethics/>).

Some of these interactions with HCPs result in consulting partnerships that are critical to the success of product design and development and product education. For any consulting relationship we may have with an HCP, the following principles apply.

- Any consulting relationship must be based on a bona fide business need pursuant to a Needs Assessment and never based on product use or prescription.
- Compensation for consulting services must be based on an objective fair market value and reflect the actual services provided.
- A written agreement must be in place prior to any compensation being provided to an HCP.
- All consulting payments must be tracked and disclosed in accordance with relevant laws, including the Sunshine Act in the United States.



We adhere to the  
AdvaMedCode of Ethics

#### **D. We Promote Our Products Accurately with Fairness and Balance**

All marketing materials must accurately reflect the capabilities, benefits, and limitations of our devices. Claims must comport with the device labeling, be supported by valid scientific evidence, and be truthful, accurate, fair and balanced.

##### Regulatory Compliance

All promotional activities must comply with local and international marketing laws, including those from the FDA, European Commission, and other relevant regulatory bodies.

##### Marketing Materials Approval

All marketing materials must go through an internal review process to ensure accuracy, compliance, and alignment with our ethical standards before distribution.

##### Education and Training

We recognize that quality education is necessary for spine health to flourish. We offer educational training programs and labs to ensure team members, sales agents, and surgeons are well-versed in the use, benefits, and limitations of our devices. These programs are designed to enhance patient safety and outcomes and to expose relevant stakeholders to the use of our products.

#### **E. We Partner with Ethical Third-Party Sales Agents and Distributors**

We build strong, professional, and ethical relationships that contribute to the success of both parties while ensuring the well-being and safety of patients. We expect our independent sales agents to uphold the values and principles outlined in the Highridge Code and to work with us to maintain a high standard of professionalism in all business dealings. We require third-party sales agents to be fully aware of and follow the Highridge Code.

All third-party sales agents must comply with all applicable laws, regulations, and industry standards governing the promotion and sale of medical devices, including but not limited to FDA regulations, the Anti-Kickback Statute, the Foreign Corrupt Practices Act (FCPA), and other anti-bribery and anti-corruption laws in the jurisdictions where they operate.

We only partner with professional  
and ethical third parties







#### **F. We Identify and Manage Conflicts of Interest Appropriately**

We recognize the importance of identifying and managing any potential conflicts of interest that may arise in the course of our work. Team members, contractors, consultants and all other stakeholders must disclose any potential or actual conflict of interest. This includes, but is not limited to, financial interests, personal relationships, outside employment, or any other situation that could potentially impact the objectivity or independence of the individual's professional duties.

We expect all team members, contractors, consultants and stakeholders to act in the best interest of Highridge and the patients we serve. Any potential or actual conflicts of interest must be managed proactively to preserve the integrity of our work and the trust of our customers, regulators, and stakeholders.

#### **G. We Utilize Social Media and Public Communications Responsibly**

At Highridge, we recognize the power of social media as a tool for communication, engagement, and education. We engage with our community, healthcare professionals, patients, and stakeholders through various social media platforms. Here's our approach to social media:

##### Professionalism and Responsibility

All official posts, comments, or interactions on social media should reflect the mission and principles of Highridge.

We ensure that all information shared is accurate, up-to-date, and in line with current regulatory guidance.



### Content Guidelines

We prioritize sharing educational content about our devices to inform and educate without providing individual medical advice.

### Confidentiality

We protect our company's confidential information and do not share proprietary or sensitive business information.

### Team Member Social Media Use

Team members should keep personal and professional social media activities separate.

## **H. We Protect Personal Data**

We are committed to protecting the confidentiality, integrity, and availability of all personal data we process. Here's how we ensure data protection:

### Compliance with Regulations

We adhere strictly to all relevant data protection laws and regulations, including, but not limited to, the Health Insurance Portability and Accountability Act (HIPAA) in the US, the General Data Protection Regulation (GDPR) in the EU, and other local data privacy laws where we operate.

### Data Collection and Use

We only collect personal and health data that is necessary for the functionality of our devices, patient care, and compliance with legal requirements. We do not disclose identifying patient information without appropriate consent. Any case studies or testimonials are anonymized or used with permission.

Data is used solely for the purposes for which it was collected, such as device improvement and mandatory reporting.



A top-down commitment  
of protecting personal data  
is essential

### III. WE PROMOTE A SPEAK-UP CULTURE

We strive for an open environment where ethical concerns or potential violations can be raised without fear of retaliation.

We will hold ourselves accountable to the Highridge Code. We expect all team members, contractors, and partners to help create an accountability culture. If you have concerns that a team member, contractor, or partner is falling short of the Highridge Code, then please appropriately report that concern.

You can do so by speaking directly to your manager, going to HR or Compliance, or if you don't feel comfortable with any of those options, you can make a report confidentially and anonymously. Our whistleblower hotline and email system are designed to protect the identity of the reporter to the fullest extent possible.

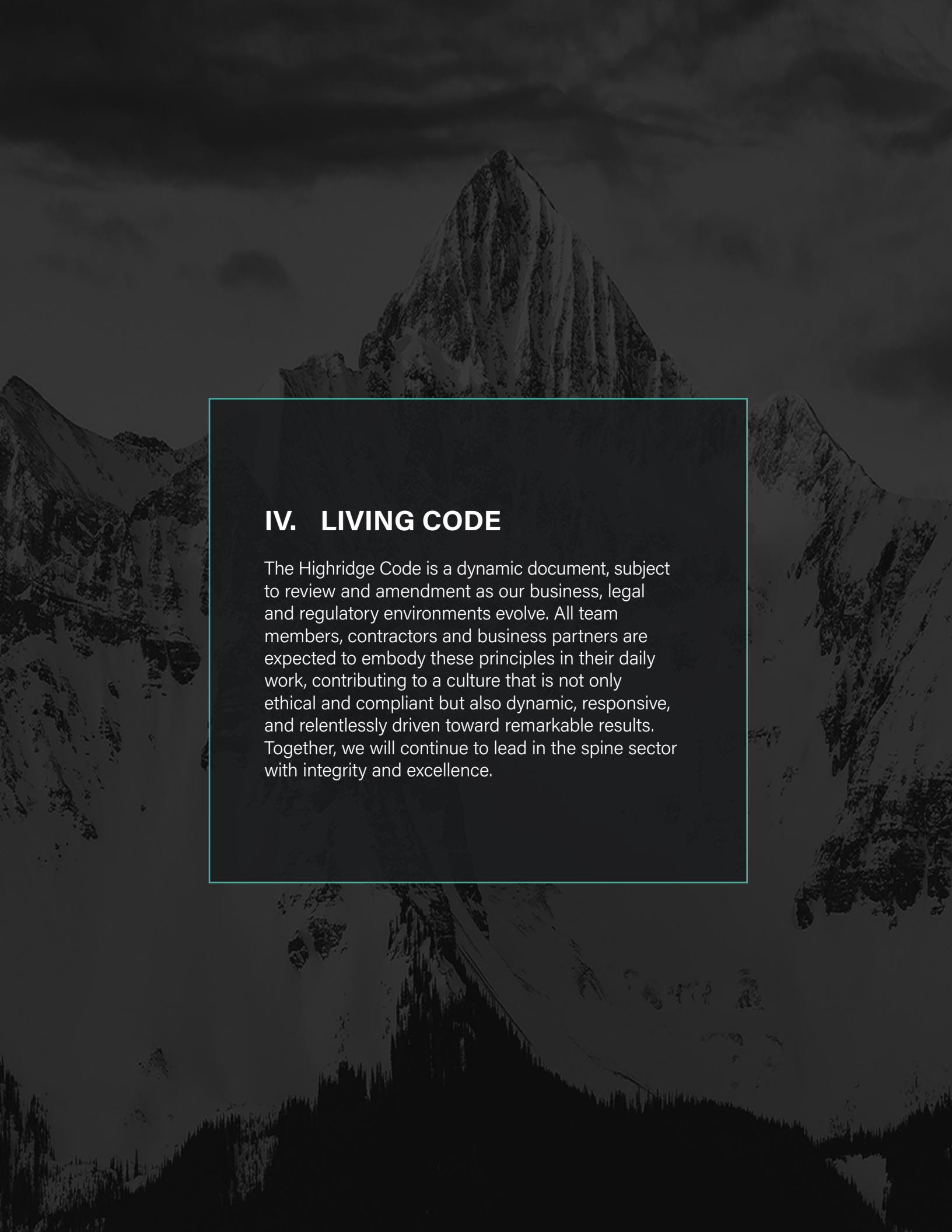
We prohibit any form of retaliation against individuals who, in good faith, report violations or participate in investigations. Retaliation can include dismissal, demotion, harassment, or any other adverse employment action.

#### **How to Report: Concerns can be reported through:**

- **Our dedicated hotline: (800) 461-9330**
- **Text: 970-762-2067**
- **Email: [compliance-hotline@highridgemedical.com](mailto:compliance-hotline@highridgemedical.com)**
- **Contact Highridge Compliance Officer or HR Department**

Ethical concerns or potential violations can be raised without fear of retaliation





## **IV. LIVING CODE**

The Highridge Code is a dynamic document, subject to review and amendment as our business, legal and regulatory environments evolve. All team members, contractors and business partners are expected to embody these principles in their daily work, contributing to a culture that is not only ethical and compliant but also dynamic, responsive, and relentlessly driven toward remarkable results. Together, we will continue to lead in the spine sector with integrity and excellence.



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