



Business Code of Ethics and Standards of Conduct

A MESSAGE FROM OUR CEO

At CIVCO Radiotherapy, we are incredibly proud of the long-term success of our business and the positive impact we have on the lives of cancer patients around the world. This success must be supported by a commitment to high integrity and mutual respect for one another, our providers, our partners, our owners and other stakeholders.

The Code of Ethics and Standards of Conduct outlines the high ethical standards and commitment to integrity that we expect from everyone at CIVCO Radiotherapy. Understanding and living by this Code will help maintain the vital trust we have established with our providers and with our fellow employees.

Please carefully read, understand and actively applying our Code of Ethics and adhere to our Standards of Conduct in your daily work. I appreciate your commitment to our values, and especially our focus on Principles, wherein we all commit to do the right thing rather than the expedient thing. This enables a culture of trust and mutual respect as we engage with our coworkers, providers, partners, suppliers and other key stakeholders that enable us to do our very best work on behalf of cancer patients around the world!

Sincerely,

Nat Geissel, Chief Executive Officer

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OUR BUSINESS CODE OF ETHICS AND COMPLIANCE POLICIES

Code of Ethics Overview

We at CIVCO Radiotherapy are dedicated to developing, manufacturing and selling only solutions and products that are safe and of high quality. We strive to conduct our operations worldwide in accordance with exemplary standards of business integrity.

To achieve this, all CIVCO Radiotherapy Employees are expected to conduct CIVCO Radiotherapy's business in accordance with high standards of honesty and integrity. So what does this mean for you?

- Read this Code fully
- Provide full and honest disclosure in any reports you prepare or file
- Follow the spirit and letter of the law in all aspects of our business
- Promptly report any violations of this Code
- Cooperate fully during all internal and external investigations

This Code will act as a guide intended to assist all of our Employees in acting and making decisions on behalf of CIVCO Radiotherapy consistent with these standards. Of course, no guidelines can be all-inclusive and responsibility for compliant and appropriate conduct rests with you.

Reporting of Violations or Concerns

There is no substitute for personal integrity and good judgment.

If you're faced with a difficult decision, consider whether you'd feel comfortable if your decision became public knowledge. If you think your decision could appear improper from a legal or ethical standpoint, are in doubt about the best course of action to take or otherwise have questions about the applicability of this Code, you're encouraged to speak with your supervisor, executive leader, or Human Resources.

We have a duty to report all inappropriate, unethical or illegal conduct or behavior in violation of this Code, the law or other CIVCO Radiotherapy policies. If you become aware of or suspect a violation, you should report it to your supervisor, executive leader, or Human Resources immediately.

If you're uncomfortable reporting to these people for any reason, you can anonymously contact the SAFE Hotline at any time at 1-855-662-SAFE or www.safehotline.com using company code 7653724403.

No Retaliation

Everyone should feel comfortable reporting possible violations in good faith. Therefore, CIVCO Radiotherapy will neither retaliate against, nor tolerate any harassment or retaliation against, anyone for reporting in good faith suspected violations of laws, regulations or CIVCO Radiotherapy policies or procedures, including this Code, or for otherwise engaging in any activity protected by law.

This means CIVCO Radiotherapy will not terminate, demote, transfer to a less desirable assignment or otherwise discriminate against you for calling attention to acts that are suspected to be illegal, unethical or in violation of this Code, providing information relating to an investigation thereof or for otherwise engaging in any activity protected by law.

However, CIVCO Radiotherapy reserves the right to discipline anyone who: (1) knowingly makes a false accusation; (2) knowingly provides false information to CIVCO Radiotherapy; (3) violates this Code, any applicable law or other CIVCO Radiotherapy policies or procedures or (4) has otherwise acted improperly.

Retaliation means any negative employment action taken against someone because he or she has made a report in good faith or is going to make a report in the future or for participating in an investigation into a report, or for otherwise engaging in any activity protected by law.

Making a report in good faith does not mean you have to be certain that something unethical is happening – it just means that you have a genuine reason to believe something could be wrong.

Disciplinary Actions

CIVCO Radiotherapy will take appropriate disciplinary action against any Employee whose actions are found to violate this Code or Company policies or procedures. ***Disciplinary actions can include immediate termination of employment.***

What actions can result in discipline?

- Any violation of this Code or any other CIVCO Radiotherapy policy
- Requesting others to violate this Code or any other CIVCO Radiotherapy policy
- Failure to promptly report, or taking actions to obscure or cover-up, known or suspected violations
- Knowingly providing false information concerning a violation or potential violation
- Retaliation against another Employee for reporting suspected violations or for taking other protected actions
- Violating any applicable law or otherwise subjecting you or CIVCO Radiotherapy to

It's important to keep in mind violations of legal and regulatory requirements can carry their own civil and criminal penalties, including fines and imprisonment. Where CIVCO Radiotherapy has suffered a loss, it may pursue its remedies against those responsible. CIVCO Radiotherapy will always cooperate fully with appropriate authorities when laws have been violated.

Confidentiality

Any report of concerns regarding violations of this Code will be kept confidential to the extent practicable or allowed by law.

However, you should be aware that there are certain situations that may require disclosure of confidential information in order to reach a resolution. Please see the section on "Confidential Information" for more details.

Director of Organizational Development

The Director of Organizational Development is responsible for administering the implementation and execution of this Code, including:

- overseeing the implementation of the Code and related policies or practices;
- overseeing administration of and compliance with the Code;
- Conducting or overseeing investigations into reported violations of the Code;
- coordinating appropriate responses to misconduct and taking action to prevent recurrence;
- coordinating any necessary training programs on topics covered by the Code and
- answering questions and providing guidance to Employees regarding the Code.

You can contact the Director of Organizational Development in person, by telephone at 319-248-6667, or by email at julia.kuyper@civcort.com. Please do so if you feel there is a need to update or amend the Code.

IMPORTANT NUMBERS

SAFE Hotline: **+1 (855) 662-SAFE
Code 7653724403**

Director of Organizational Development: **+1 (319) 248-6667**

Waivers of the Code

Waivers of the Code for Executive Leaders may be made only by the CEO or Board of Directors, as appropriate. The Director of Organizational Development must make any waivers of the Code for other Employees in writing. Requests for such waivers should be directed, in writing,

to the Director of Organizational Development.

Your Responsibility and Commitment in Administration of the Code

All CIVCO Radiotherapy Employees are required to adhere to the letter and spirit of this Code. This means complying with applicable legal requirements wherever you are around the world. Moreover, we expect Employees to engage in ethical behavior at all times and to discuss questions or concerns with the appropriate Company personnel whenever they are in doubt regarding the best course of action.

Employees will receive, and will acknowledge receipt of, a copy of this Code at the time they join CIVCO Radiotherapy and **annually** will acknowledge their continuing commitment to the Code. Updates to the Code will be distributed to Employees as needed, to reflect any changes.

CONFIDENTIAL INFORMATION

CIVCO Radiotherapy must balance its interests in maintaining the confidentiality of information about its business with its responsibilities to make timely, complete and accurate disclosure of such information where obligated to do so by applicable law. This means CIVCO Radiotherapy requires Employees who deal with or become aware of confidential information to comply with the following guidelines and procedures.

Information to be Protected

What is Confidential Information? All company information (or information others have entrusted to CIVCO Radiotherapy) that is:

- not generally known by the public;
- might be of use to competitors if disclosed
- is harmful to CIVCO Radiotherapy (or its customers or business partners) if disclosed inappropriately.
- business plans, STE documents, or other documents
- product development work or information on any product not yet launched to the market
- customer lists, customer contact information, customer pricing, customer purchase history, or other data regarding our customers

Our Duty to Protect Information Entrusted to Us

We have a duty to maintain the confidentiality of all confidential information entrusted to us by CIVCO Radiotherapy, “Designated Companies”, or their customers, unless disclosure is authorized or legally mandated, and subject to all applicable laws.

“Designated Companies” means any company CIVCO Radiotherapy has dealings with, such as:

- current contractual arrangements (i.e. customers; suppliers; distributors; OEM’s; licensees and licensors)

- possible contractual arrangements (including negotiating joint ventures, acquisitions, purchasing or selling securities or assets, etc.)

Restricted Access

Access to non-public information is restricted to CIVCO Radiotherapy personnel only on a “need-to-know” basis. This means that every reasonable effort needs to be taken to limit both the number of CIVCO Radiotherapy personnel becoming aware of the information and the duplication and circulation of written materials containing the information.

Generally, you should exercise your best judgment on what steps to take to restrict access to and otherwise protect the confidentiality of non-public information. In case of any doubt, immediately consult with your supervisor, executive leader or Human Resources.

If you obtain information as a result of service to CIVCO Radiotherapy, you must:

- not disclose non-public or other confidential information to anyone, inside or outside of CIVCO Radiotherapy (including family members), except on a strict need-to-know basis and under circumstances that make it reasonable to believe that the information will not be misused or improperly disclosed by the recipient.

Disclosure of Non-Public Information

Generally, public disclosure of non-public information is the responsibility of management, so it’s important to maintain confidentiality of non-public information regardless of whether public disclosure has occurred or you believe it has occurred, except where the disclosure is expressly authorized, permitted or required by law.

If you are contacted by anyone outside of CIVCO Radiotherapy to discuss confidential information, **do not disclose any confidential information** and please refer them to the appropriate CIVCO Radiotherapy executive leader, usually the **Sr. Marketing Communications Manager**. Other than on the “need to know” basis, no disclosure will be made without the prior approval of appropriate management.

RELATIONS WITH CUSTOMERS, SUPPLIERS AND COMPETITORS

Our success depends on building good relationships with our providers and suppliers. Cultivating an atmosphere of trust and selling our solutions on the basis of merit are fundamental to this goal.

Fair Dealing

We should all strive to deal fairly with CIVCO Radiotherapy’s providers, suppliers and competitors. To that end, we must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

Unfair Competition - Antitrust

Everyone must fully comply with the antitrust laws of the U.S. and the competition laws of every country wherein we do business.

Where U.S. laws concerning competition differ from local law and there is uncertainty as to which law applies, the more restrictive standard will be used.

Antitrust laws forbid agreements between competitors on prices; terms; profits; division or allocation of customers, markets or territories; credit arrangements; methods of distribution or any other activity that restrains competition.

Standard of Conduct

- Avoid any conduct that violates, or might even appear to violate, both the letter and spirit of an antitrust law.
- Don't enter into any agreement or understanding with any competitor regarding price.
- Don't engage in or discuss with competitors or other business partners any prohibited activities that might be interpreted as an effort to improperly restrict or limit competition (such as pricing or sale terms).

Information concerning competitor strategies and market conditions obtained from our customers or other sources is both legitimate and desirable. **However, you may not request customers to serve as an intermediary to communicate with our competitors.**

You should not obtain, accept, disclose, use or suggest that you or CIVCO Radiotherapy possess another company's trade secrets under improper or questionable circumstances. Trade secrets include any information, documents or material whose contents are not generally known or ascertainable, have not generally been disclosed by the owner and are likely to be safeguarded by the owner.

Additionally, you should not endeavor, directly or indirectly, to restrict any customer's freedom to set his or her own prices for the resale of any CIVCO Radiotherapy product.

Further, any unnecessary contact with CIVCO Radiotherapy's competitors should be avoided. As a general rule, contacts and communications with competitors should be limited to those which are inadvertent and unavoidable (like trade shows and certain outside seminars) and you should seek appropriate clearance before engaging in further contacts or communications.

Sales & Marketing: Disparagement of Competitors

CIVCO Radiotherapy advertising and marketing must comply with all applicable governmental laws, rules and regulations that prohibit unfair and deceptive trade practices. This includes any advertising and sales promotion policies.

It is CIVCO Radiotherapy's policy to emphasize the quality of its products or services; however, you must not make unfounded, disparaging comments about competitors or their products or services. Statements (oral or written) made concerning a competitor or its products or services must be fair, factual and complete.

When communicating about a competitor or its products or services:

- Avoid comments about a competitor's character or business practices (*e.g.*, telling a customer that a competitor's sales representative is immoral or untrustworthy).
- The primary emphasis should be on CIVCO Radiotherapy's capabilities, know-how and the benefits of our products, rather than on a competitor's deficiencies.
- Avoid references to a competitor's non-product or non-service-related troubles or weakpoints (*e.g.*, financial difficulties, pending lawsuits, government investigations).
- Statements about the specifications, quality, utility or value of a competitor's products or services should not be made unless they are substantiated by the competitor's current published information or other factual data with respect to the competitor's current products.
- Unsubstantiated claims that CIVCO Radiotherapy originated a product or service or one of its features should not be made.

Product Safety

Manufacturing, distributing, and marketing only products that can be used safely is a key business objective of CIVCO Radiotherapy. To that end, CIVCO Radiotherapy products will be tested to assure quality and safety standards are met. Additionally, our products will be accompanied by clear and relevant safety information and appropriate warnings and instructions for use regarding any reasonably foreseeable hazard that our products may pose to persons, property or the environment.

It is important to make sure that you do not authorize the shipment of product known or suspected to be defective, unsafe or unsuited for its intended use.

Medical Device Ethics

CIVCO Radiotherapy follows all applicable laws and regulatory requirements for the development, manufacturing, distribution and marketing of our medical devices. Employees must ensure compliance with regulations, as well as product quality and safety standards and all other applicable standards and requirements.

In addition, we voluntarily hold ourselves accountable to the ADVAMED Code of Ethics, and employees are trained on this annually.

Offering Gifts, Entertainment and/or Travel to Customers

Attempting to improperly influence customer purchasing decisions on the basis of personal gifts, offers of entertainment, travel, discounts or special favors is inappropriate, unacceptable and in some instances, unlawful, and is prohibited. For that reason, do not offer money, gifts or other items of value to customers or prospective customers that are or may be construed as an attempt to improperly influence their relationship to CIVCO Radiotherapy's business interests.

There may be instances where local tradition or business practice outside of the United States calls for giving gifts for certain occasions. If that's the case, small gifts of nominal value can be presented, as long as the cost for that gift is fully documented. It is also important to ensure

that the gift is consistent with CIVCO Radiotherapy's more detailed compliance programs and policies. A gift is never permitted if prohibited by law (Anti-Kickback statute, Sunshine Act, etc.) or it is intended to be or would appear to have an improper influence. Additionally, gifts of cash or cash equivalents (such as gift cards) are never acceptable.

Before accepting a gift, ask yourself:

- Is the type of gift or invitation appropriate in a business relationship?
- Is the frequency you accept offers of entertainment excessive?
- Have you secured the approval of your supervisor, executive leader, or Human Resources in advance?

Accepting Gifts from Vendors and Suppliers

Business gifts of significant value offered to you may be intended to influence the selection of vendors or suppliers. Therefore, CIVCO Radiotherapy's standards governing the acceptance of gifts from vendors or suppliers or their agents mirror those relating to giving gifts to our customers and prospective customers.

Decisions about accepting gifts or entertainment from vendors or suppliers should be governed by local custom, discretion and good judgment. As a general rule, business gifts may be accepted provided they are of nominal value and include no cash or financial securities. In the case of meals, entertainment, lodgings or

offers of travel, the decision to accept should be guided by good judgment taking into account the principle of reciprocity, that is, whether the individual who received such an offer is in a position to give a similarly valued gift and expense its cost under CIVCO Radiotherapy's normal expense account procedures.

When it comes to gifts and entertainment, keep these in mind:

Don't give gifts that are excessive, improper or even give the appearance of being improper

Don't solicit gifts, entertainment or favors of any kind from suppliers, customers or competitors.

Don't accept gifts of more than nominal value unless approved by your supervisor, executive leader or the Director of Organizational Development.

Gifts must be properly reflected in the Company's financial books and records.

Prior disclosure of the gift to your supervisor, executive leader and/or the Director of

Organizational Development to secure their approval can often eliminate any possible issues or potential misunderstandings.

If the gift involves a government or public official, it is crucial you comply with the information provided in the section on the Foreign Corrupt Practices Act.

If you have concerns whether a particular gift is permissible under this policy or if you want approval for any gift or entertainment not covered here, contact your supervisor or executive leader.

RESPONSIBILITY TOWARD COMPANY PERSONNEL

The relationship between CIVCO Radiotherapy and its employees is based on mutual respect, reciprocal trust and shared objectives. Treating each other with respect, as further outlined below, is the foundation of good business conduct, and is the first step in living up to CIVCO Radiotherapy's People value.

Commitment to diversity, equity and inclusion

CIVCO Radiotherapy expects all employees to offer their full respect to others, whether like or unlike themselves, and to promote the inclusion of all team members in robust, open, and impactful dialogue on the things that matter to their roles, responsibilities, and daily work experiences. In keeping with our inclusion statement, all employees are responsible for ensuring an atmosphere where we value belonging, appreciation, compassion and kindness, and where we respect our differing perspectives and backgrounds.

Health and Safety

CIVCO Radiotherapy continually strives to provide a safe and healthy workplace in compliance with all applicable governmental laws and regulations. To support that initiative, you are expected to comply with all applicable workplace health and safety rules. If your position requires compliance with any workplace safety and health requirements, you must be provided with the appropriate training.

Threats or acts of violence will not be tolerated and must be reported immediately. Any Employee who threatens or perpetrates a violent act will be subject to disciplinary action, up to and including termination of employment, civil litigation and/or criminal prosecution.

How can I help to promote a safe workplace?

- Abide by this Code and applicable laws and policies.
- Intervene quickly if you see something unsafe or witness someone behaving unsafely.
- Be aware of how your decisions and actions will affect the health and safety of others. We are responsible for ourselves and one another.

Non-Discrimination and Harassment

In compliance with all applicable laws, CIVCO Radiotherapy does not discriminate in its hiring, promotion or other employment practices on the basis of race, color, age, national origin, citizenship, gender, gender identity, gender expression, sexual orientation, religion, disability, pregnancy, veteran status, marital status, genetic information, or any other characteristic protected by law. In fact, CIVCO Radiotherapy is strongly committed to recruiting, hiring and promoting qualified individuals from racial minority groups, as well as women, veterans and those with disabilities.

CIVCO Radiotherapy is determined to maintain a work environment that is free of all forms of harassment, including verbal or physical abuse or intimidation of, or conduct that denigrates or shows hostility or aversion to, any person because of race, color, religion, gender, gender identity, gender expression, sexual orientation, national origin, citizenship, veteran status, age, pregnancy or disability. Accordingly, any such harassment, disparaging comments or insults will not be tolerated.

Harassment can take many forms, including unwelcome verbal or physical contact, written communication or repeated misconduct that a reasonable person would see as offensive. Bullying and harassment of any type, whether sexual in nature or not, is a violation of our policies. Harassment does not require intent.

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| <p><u>DO:</u></p> <ul style="list-style-type: none">• respect the diverse characteristics of your fellow employees• build trust in your teams through respect• speak up if you suspect or observe that someone is being harassed or bullied | <p><u>DON'T:</u></p> <ul style="list-style-type: none">• create hostile or intimidating environment through your actions or words• make inappropriate comments or jokes• be insulting or abusive to or about anyone |
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Any Employee who believes that he or she (or another employee) was subjected to discrimination or harassment should report the matter to their supervisor, executive leader, the Director of Organizational Development or to the SAFE Hotline 1-855-662-SAFE or www.safehotline.com using company code 7653724403. All allegations of any kind asserted by or against an employee, former employee, vendor, customer or contractor involving discrimination, harassment, hostile work environment, safety or environmental concerns or retaliation must be reported to the Director of Organizational Development.

Privacy

CIVCO Radiotherapy respects the privacy of its Employees and recognizes that some of the data collected in Company files pertains to the individual's background, family, income, contributions and health-- information which is confidential in nature. Employees with access

to this type of information must comply with all applicable laws, rules and regulations that impose a standard of confidentiality for such records and the disclosure of such information. Therefore, if you have access to such records, apart from disclosure that may be required by law, you are not authorized to release data concerning the personal affairs of any Employee to anyone outside of CIVCO Radiotherapy except on a demonstrated need-to-know basis.

Substance Abuse

CIVCO Radiotherapy is committed to providing workplaces free of substance abuse. Accordingly, Employees must report to work in condition to perform their duties, free from the influence of illegal or unauthorized drugs, marijuana or alcohol. In addition, the use, possession or distribution of illegal or unauthorized drugs, marijuana or alcohol on Company time or Company premises is prohibited.

CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES

Conflicts of Interest

We must be careful to avoid actions that conflict, or even appear to conflict, with CIVCO Radiotherapy's best interests. A "conflict of interest" occurs when an individual's private or personal interest interferes in any way, or even appears to interfere, with the interests of CIVCO Radiotherapy. These can include:

- representing CIVCO Radiotherapy in dealings in which that individual has a vested interest;
- soliciting personal favors from those with whom CIVCO Radiotherapy does business;
- working for or providing advice or consulting services to a competitor, supplier or customer of CIVCO Radiotherapy, running a business that competes with CIVCO Radiotherapy or taking a position that interferes with one's duties to CIVCO Radiotherapy;
- becoming a director or officer of or having a financial interest in a company with whom CIVCO Radiotherapy does business or competes; and
- other circumstances in which the person's loyalty to CIVCO Radiotherapy would be divided.

These situations, and others like them, must be avoided unless approved by the Director of Organizational Development or, in the case of executive leaders, by the Chief Executive Officer.

CIVCO Radiotherapy Employees may not have a financial interest in any Company customer, supplier, distributor, sales representative or competitor that might cause divided loyalty or even the appearance of divided loyalty.

A conflict can arise when an employee:

- takes actions or has interests that may make it difficult to perform their duties objectively and effectively
- receives (directly or indirectly) improper personal benefits as a result of their position with CIVCO RT (an indirect benefit may be provided to a family member)

If you are ever in doubt about the propriety of a situation or transaction, consult your supervisor or the Director of Organizational Development

Loans from CIVCO Radiotherapy to Employees are not permitted.

Employees may not perform outside work for other parties or solicit such business on Company premises or Company time. Neither are they permitted to use Company equipment, telephones, materials, resources or proprietary information for any outside work.

Each Employee must promptly disclose his or her actual or potential conflicts of interest to his or her supervisor or to the Director of Organizational Development. Executive leaders should disclose actual or potential conflicts of interest to the Chief Executive Officer. No reprisals shall occur as a result of such disclosures, and where possible, CIVCO Radiotherapy will work to enable the best interests of both the employee and the business, but in all cases, CIVCO RT's interests must come first.

Corporate Opportunities

Employees owe a duty to CIVCO Radiotherapy to advance its legitimate interests when the opportunity to do so arises. No Employee may:

- personally take for themselves, or help others take for their benefit, a business opportunity that is discovered through the use of Company property, information, systems, relationships or position;
- use CIVCO Radiotherapy's name, property, information or position for personal profit, gain or advantage (other than compensation from CIVCO Radiotherapy) or
- compete with CIVCO Radiotherapy.

Each Employee must be particularly attentive to the possibility of misappropriating corporate opportunity of CIVCO Radiotherapy and, in any case of uncertainty, an Employee should promptly consult with his or her supervisor, executive leader or the Chief Executive Officer. CIVCO Radiotherapy shall then determine what, if any, action may be appropriate in response.

PROTECTING CORPORATE ASSETS

We have a duty to safeguard CIVCO Radiotherapy's assets against theft, loss or misuse. Assets can include:

- intangible assets (e.g. customer lists, manufacturing processes, engineering drawings and specifications, software code, intellectual property and a variety of information in written or digitally stored form)
- tangible assets (e.g. money, equipment, supplies, facilities, inventory and materials)

Constant vigilance in protecting CIVCO Radiotherapy's trade secrets, business data and proprietary know-how against industrial espionage is expected.

Similarly, responsible management of CIVCO Radiotherapy's resources requires responsible uses of CIVCO Radiotherapy's material assets and personnel time. CIVCO Radiotherapy resources must not be diverted for unauthorized uses.

Proper Use of Corporate Assets

Every Employee with access to company money or property has an absolute responsibility to manage it with integrity and to avoid any misuse of such assets. Fraud, theft, embezzlement or other improper means of obtaining corporate funds by CIVCO Radiotherapy personnel are unethical, illegal and completely unacceptable. Unless specifically authorized, you may not misuse or remove from CIVCO Radiotherapy facilities any company property (e.g. furnishings, equipment, supplies, and any property created, obtained or copied by CIVCO Radiotherapy for its exclusive use such as files, reference materials and reports, computer software, data processing systems and data bases).

The integrity of CIVCO Radiotherapy computer programs and data must not be compromised. Exercise great care in protecting these assets against intentional or unintentional corruption.

When is Use Proper?

- When used for intended business purposes
- Reasonable and limited personal use of your CIVCO Radiotherapy issued computer

When is Use Improper?

- When used for outside business or personal political activities
- When used to download, view or send materials that are unlawful, unlicensed, unauthorized, unethical, or obscene

CIVCO Radiotherapy's products are its property, and contributions an Employee makes to the development and production processes of CIVCO RT products or processes while employed by CIVCO Radiotherapy are company property and remain company property even if his or her employment is terminated.

It is important that we prevent theft or misappropriation of company property by taking continual care to limit such losses by normal precautions and by handling company assets in a prudent manner.

Safeguard company property by:

- following IT policies and procedures, including use of VPN when on public networks and refraining from inserting thumb drives or other external memory devices into CIVCO Radiotherapy computers, either for extracting company information from your computer or opening files from an unknown or untrusted source.
- locking up equipment, supplies and materials when no one is around to secure them,
- protecting user IDs and passwords,
- being alert to phishing scams and other attempts to obtain sensitive personal or corporate information,
- recognizing that bad actors continuously attempt to deceive company employees and fraudulently obtain company property (such as company funds through false pretenses),
- reporting suspicious persons or activities to security personnel,
- shredding documents containing confidential or sensitive information when no longer needed
- refraining from downloading unauthorized applications or software and
- avoiding discussions of sensitive or confidential company information in the presence of unauthorized persons (i.e. hallways, elevators, restaurants, social media platforms).

Records Management

It is important to maintain our records in a way that complies with all applicable laws, rules and regulations, and allows for availability in case of litigation, audits or investigation.

All Employees are required to cooperate fully with any appropriately authorized internal or external investigation, including violations of this Code and pending litigation. If you are requested to preserve documents in accordance with an investigation or legal hold, you must fully comply, and should never withhold, tamper with, destroy or fail to communicate relevant information.

Intellectual Property

CIVCO Radiotherapy has made major investments in its intellectual property which includes:

- patents
- tradenames
- software code
- trademarks
- brand names
- engineering drawings

- information pertaining to products under development
- vendor lists, contact information or pricing information
- customer lists, contact information or pricing information
- proprietary information (e.g. processes, data, know-how, trade secrets, formulas, improvements, production techniques, computer programs, pricing and lists)

Employees may not disclose to unauthorized individuals--whether inside or outside of CIVCO Radiotherapy--any information that would tend to compromise proprietary technologies or trade secrets, or operating secrets. In addition, reasonable precautions should be taken to prevent the inadvertent disclosure of such information. This confidentiality of company information applies both throughout employment and after an individual has left employment.

Should unauthorized or inappropriate disclosure of proprietary information occur, whether unintentional or not, this must be reported to your executive leader immediately to enable the company to take steps to protect the disclosed information.

In addition, just as CIVCO Radiotherapy expects its intellectual property and proprietary information rights to be observed, CIVCO Radiotherapy respects the property rights of others. Accordingly, it is contrary to CIVCO Radiotherapy policy for Employees to intercept, duplicate or appropriate through electronic or other means materials such as computer software, audio or video recordings, publication or other protected intellectual property, except by permission of the patent or copyright holders. Any offer of confidential information from outside sources should be refused unless appropriate legal safeguards are taken.

ACCURACY OF CORPORATE RECORDS AND REPORTING

All of our Employees generate records as part of their regular tasks and it is crucial that all CIVCO Radiotherapy Employees make only true and accurate statements and representations. This applies not only to CIVCO Radiotherapy records, but also to government agencies, suppliers, customers, the press and the general public. Every Employee involved in creating, transmitting or entering information into CIVCO Radiotherapy's financial and operational records (including time sheets, sales records and expense reports) is responsible and must take care to do so completely, honestly and accurately.

How to Ensure Accuracy

To ensure compliance with this policy, it's important that we strive to:

- ensure that business transactions are properly authorized and that clear, complete and accurate entries of those transactions are created and recorded on CIVCO Radiotherapy's books and records in accordance with Generally Accepted Accounting Principles and CIVCO Radiotherapy's internal controls, policies and procedures;
- detail the true nature of every transaction or payment in supporting documentation;
- report the existence of any undisclosed or unrecorded funds or other assets;

- ensure that all reports to regulatory agencies are full, fair, accurate, timely and understandable;
- cooperate with investigations into or audits of CIVCO Radiotherapy's financial records;
- to the extent estimates and accruals are necessary in Company reports and records, ensure they (i) are supported by appropriate documentation and based on good faith judgments compliant with CIVCO Radiotherapy's accounting policies and procedures and (ii), to the extent material, have been approved by management;
- ensure payments are only made to the person or the firm that actually provided the related goods or services and
- ensure that contacts with taxing authorities are handled in accordance with CIVCO Radiotherapy's accounting policies and procedures.

All Employees are expected to submit accurate and timely expense accounts. To submit an expense account for meals not eaten, miles not driven, airline tickets not used or for any other expense not incurred in the course of handling CIVCO's business is dishonest reporting and is prohibited and subject to disciplinary action up to and including termination.

Accounting Controls

All transactions must be properly and accurately recorded on CIVCO Radiotherapy's books and records, in compliance with Generally Accepted Accounting Principles, CIVCO Radiotherapy's internal control over financial reporting and other internal controls, and any other applicable Company policies and procedures. No unrecorded bank accounts, corporate funds or assets may be maintained, and all entries made in any corporate books or records must be accurate and comply with CIVCO Radiotherapy's policies and procedures. Furthermore, it is the responsibility of all CIVCO Radiotherapy Employees, within the scope of their employment duties, to ensure that all financial recordkeeping and records to governmental agencies be truthful and accurate.

All CIVCO Radiotherapy personnel subject to this Code are prohibited from coercing, manipulating, misleading, defrauding, or improperly influencing any independent or certified accountant involved in auditing or reviewing CIVCO Radiotherapy's financial statements.

Documentation

Corporate funds may not be paid with the intent or understanding that any part of such payment is to be used for a purpose other than that described by the document supporting the payment.

Any documentation of corporate actions should comply with reporting policies, procedures and requirements and any applicable governmental agency providing oversight or having jurisdiction over such matter. Documentation should be accurate and retained as provided by statute, regulation or instruction by such agencies. Employees are strictly prohibited from destroying, altering or falsifying documents or records with the intent to impede, obstruct or improperly influence the investigation or proper administration of any matter within the

jurisdiction of any governmental department or agency.

Anti-Money Laundering

CIVCO Radiotherapy is committed to the prevention, detection and reporting of money laundering and terrorist financing. Money laundering is the process of converting illegal proceeds so that funds are made to appear legitimate. To protect our company, you must act diligently to prevent any CIVCO Radiotherapy products or services from being used to further money laundering. If you detect suspicious activity, promptly report it to your supervisor or the Controller.

RESPONSIBILITIES TO THE PUBLIC

Relations with Public Officials; Foreign Corrupt Practices Act

CIVCO Radiotherapy strictly abides by all applicable anti-bribery and anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. CIVCO Radiotherapy prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business.

CIVCO Radiotherapy has developed policies, procedures and internal controls for complying with anti-bribery and anti-corruption laws. This includes conducting third-party due diligence to mitigating the risk of becoming involved in corruption through third parties.

In dealing with regulatory agencies, government agents, public officials, political party officials or political candidates, employees must not:

- engage in any improper conduct intended to obtain, retain or direct business,
- improperly influence any such persons or their associates into taking improper actions, avoiding taking required action, or otherwise in the conduct of their duties.

Payments, gifts or other things of value are not to be given to governmental officials for any reason whatsoever. This holds true both in the U.S. and abroad even though payment by CIVCO Radiotherapy personnel to foreign governmental or quasi- governmental agencies to facilitate or expedite the performance of routine governmental actions not involving diversion to award business to or continue doing business might be permitted under U.S. and/or foreign law.

What are our responsibilities?

- Never offer, promise, or provide anything of value (no matter how nominal) to a government official in order to gain a business advantage.
- Never instruct, authorize or allow a third party to make a prohibited payment on your behalf.
- Never make a payment to a third party knowing or having reason to believe that it may be used to improperly provide something of value to a government official.
- Always record any payments made or receipts obtained accurately, completely and in a timely manner.

Remember, a bribe can take the form of money, gifts, services or other benefits.

A third party cannot be used to try to hide a bribe. Suppliers, agents, distributors and business partners cannot offer or receive a bribe related to working for CIVCO Radiotherapy or on CIVCO Radiotherapy's behalf.

Appropriate due diligence must be carried out in relation to third parties who are assessed as presenting a risk. Payments and expenses must be closely monitored and audited to ensure compliance with this provision.

Deviation from this policy should be considered and approved only on a case-by-case basis and only after consultation with your executive leader and approval from the Chief Executive officer. Requests by governmental agencies for information or meetings other than routine communications in the ordinary course of business (e.g., routine export compliance communications) should be referred to your executive leader.

If your personal safety, security or freedom of movement is at risk, a payment may be made and then reported to the Director of Organizational Development and Chief Executive Officer after the fact and must be properly reflected in the Company's books and records.

Political Activities and Contributions

CIVCO Radiotherapy is committed to complying with any applicable laws regarding political contributions, including those that prohibit companies from making political contributions in connection with elections. CIVCO Radiotherapy Employees are prohibited from conducting political activities using company time, property or equipment. In addition, you must not make any political contribution in CIVCO Radiotherapy's name or on behalf of CIVCO Radiotherapy. This includes not only direct contributions to candidates, but also other activities such as buying tickets to a political event, providing goods or services or paying for advertisements and other campaign expenses.

Media Contact; Public Statements

In order to ensure that all disclosures and public statements regarding CIVCO Radiotherapy information, including but not limited to information relating to financial performance, products, business dealings, material contracts and other information important to regulators, medical providers and the general public, are accurate and in full compliance with applicable laws and regulations, including FDA regulations on product claims, CIVCO Radiotherapy requires that all such disclosures be made only through specifically established channels. Unless you have been specifically authorized to do so, Employees are prohibited from discussing company affairs with media representatives, government officials, or other

outside persons.

In order to make sure that news released about CIVCO Radiotherapy is accurate, timely, consistent and in compliance with applicable legal requirements, such releases are the responsibility of CIVCO Sr. Marketing Communications Manager, to be carried out pursuant to appropriate procedures as they shall develop and implement. As a general rule, all inquiries from general, trade or finance news media should be referred to the Sr. Marketing Communications Manager and no comments or information should be provided without authorization from them or the Chief Executive Officer.

Social Media Use

We must be cognizant of the impact and unintended consequences that can result from our use of social media. To that end, any use of social media must be in compliance with applicable law, rules, regulations and CIVCO Radiotherapy policies. Employees must ensure all communications are professional and do not have a negative impact on our company or employees. In addition, we must not make personal comments that could be interpreted as a comment or endorsement by CIVCO Radiotherapy.

Most importantly, we must never discuss or disclose confidential information or release material, non-public information. Please see the section on “Confidential Information” for more details.

Denigrating, demeaning, harassing, or making libelous comments about CIVCO Radiotherapy employees, customers or business partners in social media is not acceptable and will be addressed in accordance with our workplace anti-harassment and anti-bullying policies.

Environmental Protection

CIVCO Radiotherapy is committed to protecting the environment, ensuring sustainability and supporting social responsibility. We are dedicated to taking all appropriate measures to assure that our manufacturing, transportation and waste disposal activities are consistent with environmental protection. This includes:

- assigning qualified personnel to manage CIVCO Radiotherapy’s environmental controls programs,
- cooperating with government and industry groups to develop appropriate standards,
- engineering production facilities to reduce or eliminate the discharge of pollutants,
- informing Employees and community residents about relevant environmental control matters,
- dealing only with reputable waste disposal contractors and
- complying with all applicable laws and regulations.

Within the scope of their employment, Employees are expected to identify and manage all environmental and social risks with applicable laws, rules and regulations pertaining to the environment. Employees are further encouraged to provide ideas to help increase the

sustainability of our business practices and reduce our impact on the environment.

Respecting Local Law and Customs

As in the United States, CIVCO Radiotherapy expects to obey the law wherever we operate. We endeavor to respect local customs and institutions outside the U.S. It's common in many countries (and often even legal in those countries) to offer payments in exchange for expedited services. However, we must not use local custom as an excuse for violating applicable laws or corporate policies. We regard observing local law to be the minimum acceptable level of conduct; CIVCO Radiotherapy's own standards frequently oblige us to go beyond that legal minimum and to conduct our affairs according to a higher standard. Therefore, we do not permit such payments.

Anyone who feels that he or she is faced with a conflict between CIVCO Radiotherapy policies and local custom or law should contact their executive leader for further guidance.

Nothing in this Code should be misinterpreted to require any activity that is prohibited by applicable law, or to prohibit any activity that is protected by applicable law.

Anti-Boycott Laws

CIVCO Radiotherapy must not enter into agreements or take actions that have the effect of furthering any unsanctioned boycott of a country that is friendly to the United States. This includes:

- refusing to do business with other persons or companies;
- discriminating in employment practices;
- furnishing information on the race, religion, gender or national origin of any U.S. person or
- utilizing letters of credit that contain prohibited boycott provisions.

CIVCO Radiotherapy must report any request to take action or attempt to reach agreement that would violate these prohibitions.

Export and Import Controls

Many countries, including the United States, place controls and/or prohibitions on certain international transactions involving exports, re-exports, imports and the disclosure of technical data to foreign persons. International transactions include the transfer or receipt of goods, technology, information, data or software for any reason and by any means, including electronic transmission. Employees must comply with all such applicable laws, rules and regulations. Prior to engaging in an international transaction, Employees must ensure that the transaction complies with all applicable laws, rules and regulations.

Embargoes and Sanctions

Many countries, including the United States, restrict financial dealings with a large number of entities throughout the world, even with entire countries. CIVCO Radiotherapy must comply fully with all economic sanctions and embargoes that restrict persons or corporations from doing business with certain individuals, groups, entities or countries. If you suspect any violation of a sanction or embargo, promptly report to the Director of Operations and Controller.

All orders are run through IntegrationPoint software to ensure the customers receiving goods from us are permitted to do so before orders are shipped. The review of orders is automated, and the Production Manager is notified of any questionable customer. The Production Manager is responsible to investigate to determine if the flagged customer is the same entity or country as listed in IntegrationPoint, and to stop the order from processing further if it is. In the case of embargo, the Production Manager is responsible to determine if medical devices are permitted to ship to that embargoed country prior to allowing the shipment to process further.

Human Rights

We are committed to respecting human rights everywhere and support global efforts to protect human rights. All of our businesses, employees, agents and vendors must comply with all applicable laws prohibiting forced labor, child labor, human trafficking and modern-day slavery.

Who to contact for help with this Code

- **Talk to your supervisor**
- **Talk to your executive leader**
- **Talk to the Director of Organizational Development**
- **Use the SAFE Hotline at 1-855-662-SAFE or www.safehotline.com using company code 7653724403**

Remember, you can always ask a question or raise concerns in person, by email or by phone. You can remain confidential or anonymous, where allowed by law. When making a report to the CIVCO Radiotherapy Technologies Ethics and Compliance Line, you do not have to include any identifying information.