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			Policy
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1 PURPOSE

The purpose of the Code of Conduct is to set our expectations, commitments and requirements for ethical conduct for our employees, stakeholders and the environment. As employees and as a company, we are responsible to act according to this Code of Conduct, and we should also expect from our suppliers and partners to act according to this Code of Conduct and the applicable laws and regulations.

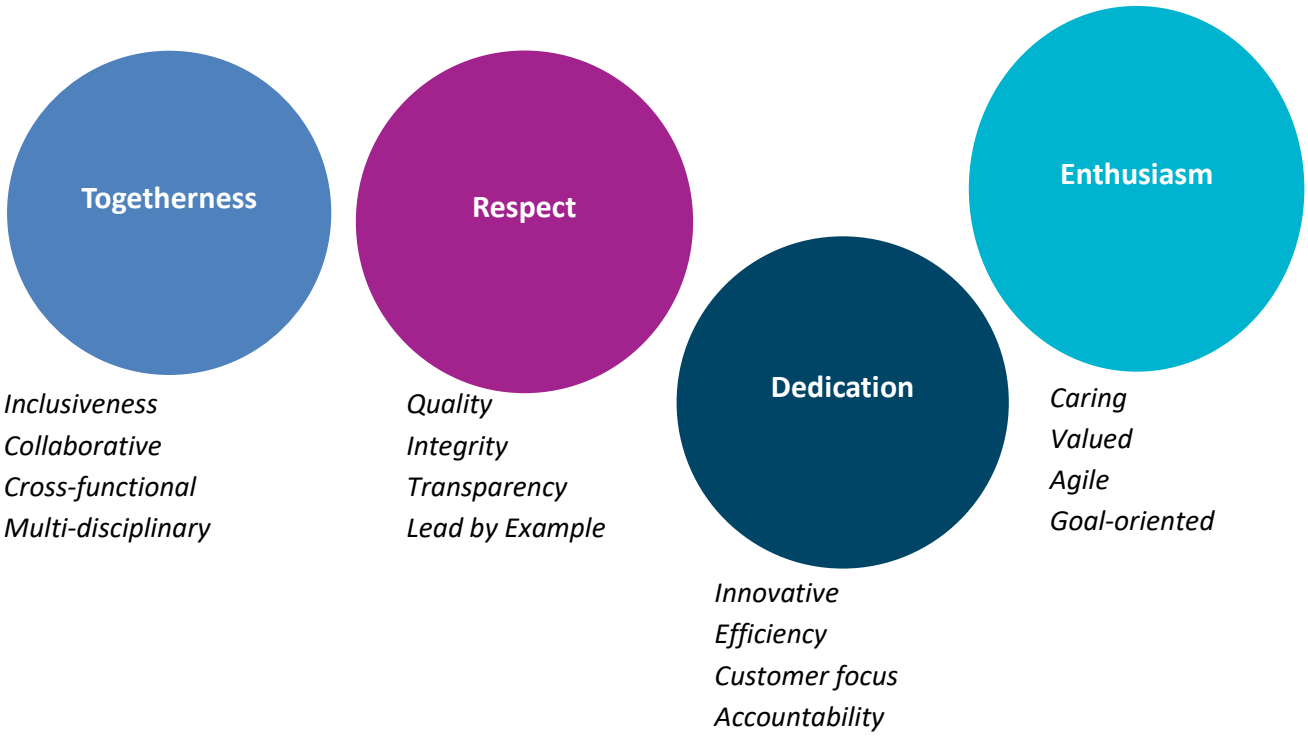
2 INTRODUCTION

The Code of Conduct is not intended to supersede national laws or regulations or professional codes that may impose more stringent requirements. Gentian Diagnostics is transparent with regards to our cooperation with healthcare professionals and organizations, and will comply to applicable laws, regulations and professional codes in the respective markets (e.g. US Sunshine Act, UK Bribery Act, MedTech Europe Code of Ethical Business practice).

2.1 Company Vision and Values

Our vision is to innovate the diagnostic efficiency. We are committed to deliver high quality products to our customers and that our products positively impact on patient outcome and the overall health sector efficiency.

The Code of Conduct also reflects our company values; Respect, Dedication, Enthusiasm and Togetherness.



3 OUR PRODUCTS AND SERVICES

We are committed to comply with current national and international laws and regulations applicable for our business and products, and to focus on continuous improvements to our products and processes.

3.1 Quality standards and good practice

Maintaining high-quality standards is essential for our business from assuring new product approvals to maintaining our reputation with patients and health authorities. Quality is every patient's right and every employee's responsibility. Quality is engrained in everything we do, from concept through continuous improvement. Gentian Diagnostics is committed to complying with legal and regulatory requirements, and to meet the high expectations of its stakeholders regarding the quality, safety and efficacy of our products and services.

Gentian Diagnostics has established a quality system which includes quality standards and procedures that employees must follow. In addition, employees must report any deviations from our standards to the quality assurance function. Gentian Diagnostics expects that its business partners also adhere to its high-quality standards.

Patient safety and timely reporting of any adverse events and product complaints is of the utmost importance. Gentian Diagnostics employees have been trained to, upon awareness, immediately report any adverse event or any product complaints to the quality assurance and regulatory function. Anyone who receives a complaint or inquiry from a customer or end-user, regardless of whether the employee becomes aware of it during or outside of work, and regardless of the communication channel (e.g. in person, via social media), is responsible for providing information to the product responsible and our regulatory and quality assurance function immediately.

Medical device reporting requires the reporting of any product complaint. A product complaint is defined as any written, electronic or oral communication that alleges deficiencies related to the identity, quality, durability, reliability, usability, safety or performance of a product that has been released from Gentian Diagnostics' control or related to a service that affects the performance of the product.

Medical device reporting is the mechanism for the authorities to receive significant adverse events reporting from manufacturers, importers and user facilities so that they can be detected and corrected quickly to reduce or avoid any risk to patients.

A Field Safety Corrective Action (FSCA) is a term that covers actions required to be taken in response to a report/information on non-conforming product(s) placed on the market. An action can vary from internal actions to a recall or withdrawal of the product from the market.

3.2 Sales, Marketing and Customer Service

Gentian Diagnostics' interactions with healthcare professionals and healthcare organisations are aimed at exchanging scientific information that can help optimise the use of Gentian Diagnostics products and services. These interactions are based on standards of ethics, integrity and fair remuneration for services.

As part of Gentian Diagnostics' interactions with healthcare professionals and organisation, Gentian Diagnostics may organise sales, promotional and other business meetings where the objective is to discuss products and related services, conduct contract negotiations or discuss sales terms.

Any sales, promotional or other business meetings should comply with the following requirements:

- Such meetings should, as a general rule, occur at or close to the healthcare professional's place of business.
- It is not appropriate for travel or accommodation support to be provided to healthcare professionals, except where display of non-portable equipment is necessary.

Gentian Diagnostics may provide products or samples at no charge to healthcare professionals to familiarise themselves with the safe, effective and appropriate use and functionality of the product. The number of samples provided to healthcare professional for further testing should be of a reasonable amount.

4 COMPANY ASSESSTS

We are committed to develop and produce products that represent a state-of-the art in the health sector and diagnostics, and to fulfil customer needs and our contractual obligations.

4.1 Intellectual property rights (IP)

Gentian Diagnostics, as a technology innovator, has an IP strategy in place which aims the protection of business relevant inventions. Business relevant are those inventions which enable a technology differentiation and/or a disease specific protection of the product(s) and with this an increased competitiveness. In addition, production processes, which improve the product quality and manufacturing efficiency, are to be protected. The protection methods are patent applications and trade secrets. The choice of the method depends on criteria, which are defined in the IP strategy.

Gentian Diagnostics is committed to respect the intellectual property rights of third parties. We expect that all our employees take the intellectual property rights of third parties into due consideration in their daily work. Whenever our intellectual property rights are violated, Gentian Diagnostics defends its rights. Violation of intellectual property rights does not only harm the assets of Gentian Diagnostics, but in many cases is also a threat to the health and safety of patients; e.g. counterfeit diagnostic products.

4.2 Confidential Information

As employees of Gentian Diagnostics, we have access to confidential information related to our business which includes confidential information about research and development projects, manufacturing methods, business plans, financial data, marketing and sales strategies, launch of products etc.

Confidential information must be treated as a most valuable asset of Gentian Diagnostics. Employees have a duty to preserve confidential information acquired during employment at Gentian Diagnostics. This means that employees shall not share any confidential information with anyone who is not employed by Gentian Diagnostics, or even with any other employees not having a current, legitimate business need to know such information.

We respect confidential information belonging to third parties. When there are specific areas of cooperation with business partners where confidential information may be shared, a confidential agreement (NDA) should be signed by both parties.

To secure the company interest in cooperation with third parties, Gentian Diagnostics has developed a set of “Rules of Engagement”. These rules of engagement are made clear in the beginning of the cooperation for both parties.

4.3 Research grants

Where permitted by national laws, regulations, national guidelines and professional codes of conduct, Gentian Diagnostics may provide restricted research grants to support clearly defined third party-initiated research studies for clinical or non-clinical research programmes in areas in which Gentian Diagnostics is interested or involved.

Research Grants may include financial support for legitimate, study-related, documented expenses or services, or reasonable quantities of single-use or multiple-use free of charge product(s) for the limited duration of the research.

Gentian Diagnostics will ensure that employees do not influence the respective research. However, in order to ensure that research grants are provided on a “restricted” basis, Gentian Diagnostics shall clarify the intended research scope and purposes for which the grant is requested and shall ensure that the written agreement with the recipient organisation includes rights for Gentian Diagnostics to verify that the grant is applied solely for the agreed intended research use.

All requests for research grants must be in writing and must detail, as a minimum; the type, nature and objectives of the research activity, the milestones and budget, the approximate duration of the research, and where applicable, the requirements for ethics committee, regulatory or other authorisations or approvals.

4.4 Company initiated research

Gentian Diagnostics may initiate, conduct, manage and finance scientific research to generate data. The research data may be required due to medical needs, including patient safety, research and development, scientific purposes (e.g. performance indicators, comparing objective scientific parameters), regulatory, including post-market surveillance and post-market performance follow up.

Any arrangements made by Gentian Diagnostics to procure research-related services shall be set out in a written agreement which shall reference a written research protocol, written schedule of work and provide for all required consents, approvals and authorisations to be obtained prior to the commencement of the study.

Gentian Diagnostics must ensure that the research activities comply with all applicable national laws, regulations and researchers' own professional codes of conduct, as well as with applicable Good Clinical Practice guidelines, if relevant.

Gentian Diagnostics shall ensure appropriate clinical trial transparency in relation to the research activities and results. This shall include appropriate disclosure of information about Gentian Diagnostics' clinical trials, for example in external public registries and peer-reviewed journals.

If any external company or consultants are hired by Gentian Diagnostics to act as study leader, a written agreement shall be in place, and Gentian Diagnostics is responsible to ensure that applicable laws and regulations are followed for the respective study.

4.5 Consultant

Healthcare professionals may be used as consultants or advisors by Gentian Diagnostics to provide consulting or other services with respect to, but not limited to, research, participation in advisory board, product development or scientific events or congresses etc.

A consulting agreement must be defined by a written agreement, signed by the parties in advance of the commencement of the services, which must specify the nature of the services to be provided and the basis for payment for those services. All required consents and approvals shall be obtained with respect to the current employer of the consultant, if applicable.

The service shall be conducted in accordance with applicable laws and regulations of the country where the healthcare professional is licensed to practice and consistent with applicable professional codes of conduct in that country.

The hiring of the consultant must not be an inducement to purchase, lease, recommend, prescribe, use, supply or procure Gentian Diagnostics' products or services.

4.6 Social media and electronic communication tools

Our communication tools cover any Gentian Diagnostics hardware such as smartphones, computers, tablets, infrastructure, as well as any collaboration solutions, including e-mail, chat and social media.

4.6.1 External communication

External communications with healthcare professionals, end-users and business partners are a key aspect for our business. Several platforms of communication may be used to distribute company information or public documents such as social media, press release, exhibitions, congress, business meetings etc.

Any company information or public document distributed externally or presented in external events should be accurate, professional, transparent and prepared according to internal procedures.

To ensure that any company information from Gentian Diagnostics is presented in a professional and accurate manner, public documents and marketing material shall be reviewed and approved by responsible personnel in the organization prior to distribution in the different communication platforms.

Responsibility for external communication towards stakeholders, business partners and healthcare professionals are defined in the organisation and coordinated accordingly.

Any publication or distribution of company information, except stock exchange releases, in social media or press releases shall be coordinated and agreed according to a separate procedure.

Gentian Diagnostics is listed on Euronext Oslo Børs and is committed to provide the market with simultaneous and timely information regarding significant developments in the group. A separate investor relations policy has been published and is based on Oslo Børs' rules, regulations and recommendations for listed companies, in particular the Oslo Børs Code of Practice for investor relations. The Company's investor relations activities shall comply with applicable rules and regulations. The Company shall maintain an open and proactive policy for investor relations, a website designed to incorporate "sound practices", and shall give regular presentations in connection with annual and provisional results.

4.6.2 Social Media

External channels that are owned by Gentian Diagnostics should only be created and managed by the marketing function. For example, communication about our products is highly regulated, and posting about products is not allowed on employee’s private channels.

4.7 Records and Information Management

Records created, updated and retained as part of our daily business activities are of outmost importance for the company and one of our most valuable assets. The organisation shall have a set of routines for creating, retention and discarding of records. Record management is

understood as the creation, retention and discarding of records. Records is not only defined by paper documents but also electronic records (e.g. documents, e-mails etc.) and video/audio.

All information documented in the company records shall be accurate, legible and traceable. This means that all information recorded should be readable during the retention period of the record and information should be recorded when an activity occurs and by whom, if possible.

Any signatures, on paper and electronic, is evidence that the record with its content is accepted, and if applicable, that the task is performed as given in the applicable instructions. Signature or acceptance on behalf of other individuals should not be done unless there is a written agreement between the individuals that this is accepted.

5 CORPORATE INTEGRITY

Gentian Diagnostics has zero tolerance for any kind of bribery and corruption.

5.1 Bribery and corruption

Gentian Diagnostics employees and its business partners are not allowed to give, promise to give, solicit or accept any form of improper advantage, whether directly or indirectly, to or from any individual or organisation with the intention to obtain or retain business in return. Improper advantages include illegal rebates, bribes, kickbacks and under-the-table payments. An improper advantage can be anything of value, including but not limited to payments, meals, gifts, entertainment, travel expenses or fake agreements.

Corruption is a form of dishonesty or criminal offense undertaken by a person or organisation entrusted with a position of authority, to acquire illicit benefit or abuse power for one's private gain.

Corruption corrodes the fabric of society. It undermines people's trust in political and economic systems, institutions and leaders. It can cost people their freedom, health, money – and sometimes their lives.

Corruption is a criminal offence and Gentian Diagnostics will always report corruption or attempts of corruption to the appropriate authority.

Gentian Diagnostics has a separate anti-bribery and corruption policy, and all employees are provided training to this policy with regular follow-up for personnel conducting towards customers or public institutions.

5.2 Data privacy

The protection and responsible use of personal data is reflected in our daily operations. We see data as a valuable element for developing innovative diagnostics solutions for patients, and as a driver for business excellence. As such, we strive to be a respected and preferred partner to all who may provide such data. We are committed to collect and use data in a

lawful, fair, legitimate and ethical way, and will always respect the privacy of individuals in order to earn and deserve their trust.

Gentian Diagnostics assumes accountability for the compliant processing of personal data by itself or by its service or cooperation partners.

Gentian Diagnostics has an active role in clinical research activities to develop new products for healthcare professionals and healthcare providers and must ensure that identifiable health information is carefully processed.

Any information related to an identified or identifiable person must be collected and processed in compliance with applicable data privacy laws (e.g. EU General Data Protection Regulation). Sensitive data include the following sources;

- Sensitive personal data and Personal data
- Confidential intellectual property
- Stock market sensitive information

Gentian Diagnostics employees with access to sensitive data (e.g. data on employees, business partners, customers and suppliers) are expected to apply the privacy principles of lawful, fair and transparent data processing, respecting any purpose limitations, as well as the principles of data minimisation, accuracy, storage limitation, integrity and confidentiality.

For clinical studies, data on samples from human donors must be anonymised and not traceable to the donor. In case some personal data is required, this should be justified and kept to minimum.

Gentian Diagnostics will never ask for or accept any data related to clinical studies which is not anonymised. Any Gentian Diagnostics employee who has access to anonymised data must not try to (re)-identify or cause identification of any individuals such anonymised data were derived from.

6 PERSONAL INTEGRITY

6.1 Conflict of interest

A conflict of interest exists when an employee's personal interests are inconsistent with those of Gentian Diagnostics and create conflicting loyalties. All Gentian Diagnostics employees must avoid situations where personal interest's conflict, or appear to conflict, with the interests of Gentian Diagnostics group.

Many actual or potential conflicts of interest can be resolved in an acceptable way for both the individual and the group. In case of a conflict of interest, the employee concerned should immediately inform its superior in order to find an appropriate solution.

6.2 Gifts and entertainment

When gifts or entertainment are exchanged out of the purest motives of personal or professional friendship, they can be misunderstood and perceived as an improper advantage. To avoid both the reality and the perception of improper relations with existing or potential business partners, both public and private, Gentian Diagnostics employees must adhere to the following principles:

6.2.1 Giving gifts/entertainment/events

- Gifts and entertainment may be given when appropriate and where there is no risk of creating a perception of influencing the recipients in their decision.
- Gifts must be of minimal value and entertainment must not go beyond what is reasonable.
- Educational events may be offered business partners or healthcare professionals in which the programme of the event is only related to the respective partnership or cooperation. Location of such an event should be within reasonable limits and not the main attraction of the event.
- Gentian Diagnostics should not facilitate or pay for any guests of business partners or healthcare professional which do not have interest in information shared at the event.

6.2.2 Receiving gifts/entertainment/events

- Demanding or soliciting gifts or entertainment of any kind is not allowed. This includes not only merchandise but all kinds of advantages.
- Unsolicited gifts or entertainment may only be accepted if they do not go beyond common courtesy and are an accepted local business practice.
- Offers of entertainment may be accepted if they arise out of the normal course of business and take place in settings that are appropriate.

6.3 Insider information and trading

Insider information is defined as non-public information about Gentian Diagnostics or its business partners which an investor would consider important in deciding whether to buy or sell the company's securities. Insider information is described in internal procedures and is applicable for the following;

a) Employees of the group that are given access to inside information
b) Primary insiders
c) Close associates to any person above in section (a) and (b).

Any employee or close associate to an employee which are given information which might be of interest of any investor, shall have training to understand the applicable laws and regulations.

7 EMPLOYEES

The Gentian Diagnostics values "Togetherness, Respect, Dedication and Enthusiasm" are meant to guide our decisions, behaviour and actions. The values are the pillars of our culture and work environment both internally and externally.

7.1 Discrimination and harassment

Gentian Diagnostics is committed to fair and equal treatment of all employees, and all people who seek employment at Gentian Diagnostics shall have equal opportunities for development and advancement. We do not tolerate any form of discrimination or harassment in the workplace.

There is no acceptance of employees being subjected to offensive, abusive or other unwanted behaviour at the workplace which violates the personal dignity of the victim or creates an intimidating, hostile or humiliating environment for the victim.

The group has put in place procedures covering how to inform management about discrimination and harassment and the group has also issued instructions on how to handle complaints regarding discrimination and harassment.

7.2 Health, safety and environment

Safety, security, health and environmental protection (HSE) are integral parts of our operations and as such we approach them with the same level of commitment as we do with any business-related activities.

Our operations are conducted in compliance with applicable laws and regulations for health, safety and the environment. We take all reasonable and practical steps to ensure that we provide a safe, secure, healthy and clean working environment. Our health, safety and environment (HSE) policy is implemented in a systematic manner by means of all necessary technical, organisational and personnel measures. HSE risks are systematically analysed, assessed and were deemed necessary, reduced or eliminated.

We strive for continuous improvement wherever possible and economically viable. We will not compromise health and safety of our employees to achieve our goals. We proactively seek improvements to minimise our impact on people and the environment. We define HSE goals, regularly monitor our performance for continuous improvements to the HSE system.

Every employee is personally responsible for health, safety and environmental protection at the workplace to the full extent required by its duties to the best of its knowledge, ability and experience, while the supervisors have overall responsibility for EHS. We are all encouraged to identify areas for improvements and continuously work towards improved safety and a better environment.