

## **SUPPLIER ETHICS & CODE OF CONDUCT POLICY**

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Apyx Medical Corporation, and its affiliated entities worldwide (Apyx Medical) are committed to the highest standards of product quality and business integrity in their dealings with customers and suppliers. Our Supplier Ethic and Code of Conduct Policy, referenced in the ethics clause of all new purchase orders, expresses the expectations we hold for our suppliers, and mirrors the standards we set for our own employees, Board of Directors, and other business associates.

Compliance with legal and ethical standards is the responsibility of everyone in the supply chain and at all levels. All suppliers and employees are expected to conduct themselves with the highest standards of honesty, fairness, and personal integrity, with adherence to all applicable laws and avoidance of the perception or appearance of impropriety or conflict of interest.

This Policy applies to all Apyx Medical Suppliers worldwide. "Supplier" means any business, company, corporation, person, or any other entity that sells, or seeks to sell, whether directly or indirectly, any kind of goods or services to Apyx Medical, and it includes the Supplier's employees, agents, and other representatives.

### **Compliance with Laws and Regulations**

Suppliers shall comply with all laws, regulations, and policies applicable to them and their dealings with Apyx Medical, including all applicable government contractual requirements, which may apply through contracts with Apyx Medical. These laws, rules, regulations, and policies include:

- Equal employment
- Anti-discrimination and harassment
- Human rights
- Anti-corruption and bribery
- Conflicts of interest
- Health and safety
- Environment
- Codes of business conduct

### **Insider Trading**

By interactions with Apyx Medical as a supplier of goods or services, suppliers may be exposed to material, nonpublic information about Apyx Medical or another company (including Apyx Medical's customers, other suppliers, vendors, or other business partners). "Material nonpublic" information includes any information, positive or negative that has not yet been made available or disclosed to the public and that might be of significance to an investor. Suppliers may not buy, sell or otherwise trade Apyx Medical's or such other company's securities or engage in any other action to take advantage of material nonpublic information, including sharing confidential information with others.

### **Gifts, Travel and Entertainment**

We compete on the merits of our products and services and do not use the exchange of business courtesies to gain an unfair competitive advantage. We expect the same of our suppliers in the offering or receipt of any gift or business courtesy, including cash and cash equivalents. In particular, note that our employees who are in any way involved in procurement decisions are subject to even more strict limitations, and may not accept any business courtesies, with the exception of very low value promotional items. In any business relationship, our suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and

regulation; does not violate the rules and standards of the recipient's organization; is consistent with reasonable marketplace customs; and will not adversely impact the reputation of either of our businesses.

### **Conflict of Interest**

A financial or any other relationship between a Supplier and an Apyx Medical employee, a family member or friend of an Apyx Medical employee that could involve a financial benefit or other personal or competing interest may create an actual, potential or perceived conflict of interest for Apyx Medical and/or a Supplier. A conflict of interest arises when the personal interests of Apyx Medical employees or agents and the Supplier (or its employees or agents) are inconsistent with his/her/its responsibilities to Apyx Medical or the Supplier. All conflicts must be disclosed and approved, or corrective action taken. Even the appearance of a conflict of interest may be damaging to Apyx Medical and to the Supplier, and it must be disclosed and approved in advance by Apyx Medical management.

### **Antitrust and Antibribery**

Apyx Medical is fully committed to competing fairly and complying with antitrust and competition laws in every country where it does business. Apyx Medical Suppliers are not allowed to fix prices or rig bids with Supplier's competitors. Likewise, Suppliers are not allowed to exchange current, recent, or future pricing information with Supplier's competitors. Suppliers are required to comply with all applicable antitrust and competition laws. Suppliers are expected to understand and comply with all applicable fair business, advertising and competition laws including antitrust laws.

All forms of corruption, such as bribery, extortion, and embezzlement, are strictly prohibited. Apyx Medical defines bribery as directly or indirectly giving or receiving (or even offering) anything of value for the purpose of obtaining or retaining business, to win a business advantage, or to influence a decision regarding Apyx Medical. This includes bribes related to obtaining licenses or regulatory approvals, preventing negative government actions, reducing taxes, avoiding duties or custom fees, or blocking a competitor from bidding on business.

Apyx Medical is committed to doing business with integrity and in compliance with the highest anti-corruption standards. Suppliers will conduct themselves with honesty, fairness, and high ethical standards, as well as abide by all anticorruption and bribery laws and avoid even the perception of impropriety or a conflict of interest in all business interactions worldwide.

### **Avoiding Unauthorized Lobbying**

We expect our suppliers not to undertake any type of lobbying or other similar representative efforts on Apyx Medical's behalf before any kind of government entity, official or body or representative without the express consent of Apyx Medical's management and through a written agreement.

### **Intellectual Property Rights, Privacy, and Data Protection**

We expect our suppliers to respect and comply with intellectual property rights. Any transfer of technology, proprietary information, or trade secrets without Apyx Medical's prior written consent is prohibited. Suppliers are required to respect the reasonable privacy and confidentiality expectations of everyone with whom they do business, and appropriately protect all data that may come into their possession because of their relationship with Apyx Medical. This includes

data relating to Apyx Medical, or its employees, customers, and partners. This also entails compliance with Apyx Medical's instructions and privacy, data protection, and security laws and regulations when personal, confidential, proprietary, or other sensitive information is collected, stored, processed, transmitted, or shared.

### **Export/Import Control**

We expect our suppliers to ensure that their business practices are in accordance with all applicable laws and regulations governing the export and import of domestic and foreign origin parts and components and related technical data.

### **Counterfeit Parts**

We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, and mark parts obsolete as appropriate.

### **Conflict Minerals**

We expect our suppliers to take steps to determine if their products contain conflict minerals (e.g. Cassiterite; Columbite-tantalite (coltan); Wolframite; Tin; (v) Tantalum; Tungsten; Gold) and if so, implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit any of the following countries: (i) Democratic Republic of Congo; (ii) Angola; (iii) Burundi; (iv) Central African Republic; (v) The republic of the Congo; (vi) Rwanda; (vii) South Sudan; (viii) Tanzania; (ix) Uganda; or (x) Zambia. We expect our suppliers to operate in a manner that actively manages risk, conserves natural resources, and protects the environment.

### **Environmental Management**

We expect our suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss, and opportunities for business growth through operational and product stewardship.

### **Non-discrimination**

We expect our suppliers to provide equal employment opportunity to employees and applicants for employment without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as the essential functions of the job can be performed with or without reasonable accommodation.

### **Harassment**

We expect our suppliers to ensure that employees may perform their work in an environment free from physical, psychological and verbal harassment, or other abusive conduct.

### **Drug-Free Workplace**

We expect our suppliers to maintain a workplace free from illegal drugs.

### **Human Rights**

We expect our suppliers to treat people with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all, and help create an inclusive and ethical culture.

### **Human Trafficking**

We expect our suppliers to not engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

### **Child Labor**

We expect our suppliers to ensure that child labor is not used in the performance of work.

### **Employee, Safety, & Health**

We expect our suppliers to comply with applicable safety and health laws, regulations, policies, and procedures. Suppliers should provide for the health, safety, and welfare of their people, visitors, and others who may be affected by their activities. to any person under the minimum legal age for employment where the work is performed.

### **Supplier Diversity**

As supply chain requirements vary by country, our suppliers should be mindful that we often have customer-directed supplier inclusion goals that may necessitate use of in-country supply channel providers both by us and our suppliers. These may additionally be defined as small business, small disadvantaged business, woman owned small business, HUBZone certified business, veteran owned business, service disabled veteran owned small business, small/medium size business, or aboriginal business.

### **Reporting Ethical Concerns**

Suppliers shall promptly notify the Apyx Medical's Ethics Office regarding any known or suspected improper behavior relating to dealings with Apyx Medical, or any known or suspected improper behavior by Apyx Medical's employees or agents. Suppliers can report any concerns by contacting the Apyx Medical Ethics Hotline, Lighthouse. Lighthouse can be contacted toll-free at 844-420-0044 or by visiting [www.lighthouse-services.com/apyxmedical](http://www.lighthouse-services.com/apyxmedical).

Acknowledgment to abide by this Policy Suppliers are expected to acknowledge this Policy and to apply it in all dealings with, and on behalf of, Apyx.

Suppliers are fully responsible for ensuring that any employee, subcontractor, agent, or other third party assigned to provide services to Apyx, as permitted by agreement with Apyx Medical, acts consistently with this Policy.

If a Supplier has a question relating to its obligations under this Policy, or if a Supplier believes that Apyx Medical, a partner, or a competitor does not comply with this Policy, the Supplier should immediately contact the Ethic Hotline reference above.

### **Supplier Certification of Compliance**

Suppliers are fully responsible for ensuring that any employee, subcontractor, agent, or other third party assigned to provide services to Apyx, as permitted by agreement with Apyx Medical, acts consistently with this Policy.

If a Supplier has a question relating to its obligations under this Policy, or if a Supplier believes that Apyx Medical, a partner, or a competitor does not comply with this Policy, the Supplier should immediately contact the Ethic Hotline reference above.

**By its acceptance of any purchase order from Apyx Medical, the Supplier acknowledges its acceptance of the Ethics and Code of Conduct and intention to comply with its requirements.**

If you have additional questions about this Supplier Ethics and Code of Conduct Policy, please contact your purchasing representative or the Global Operations department for further information.