



Pioneer Surgical Technology Ethical Statement

Pioneer Surgical Technology exists to provide innovative solutions to patient diseases and conditions. All of its actions shall be guided by the Pioneer Mission Statement, this statement of policy, applicable law and the Code of Conduct as these are revised over time.

Ethical conduct by all those involved with Pioneer is mandatory. This Ethical Statement requires the following:

We respect the rights and property of others, including their intellectual property, and only accept their confidential or trade secret information after we clearly understand our obligations as defined in a non-disclosure agreement or similar document.

We protect and preserve PST assets, including PST business opportunities and intellectual property, for PST's benefit and not for our personal benefit.

We compete fairly without collusion or collaboration with competitors to divide markets, fix prices, restrict production or allocate customers.

We assure that those who seek to do business with PST have fair opportunities to compete for our business.

We provide full and accurate information for use in internal and external reports.

We keep records that are verifiably accurate.

We will not use company assets for personal purposes.

We recruit, employ, train, promote and reward people based on their performance and contribution.

We respect all PST employees without regard to their position or level within the organization.

We follow and respect the codes of conduct and rules of business of countries where we do business and abide by their laws.

We comply with laws, rules and regulations and actively promote awareness, understanding of and compliance with all applicable laws.

We offer no payments or favors to influence others to obtain sales.

We value open and fair competition and respect the rights of our customers, suppliers and competitors just as we expect our rights to be respected.

We actively encourage every PST employee, officer and director to recognize and report any concern about possible illegal or unethical behavior, and we ensure that such reports made in good faith will be acted upon responsibly and without retaliation.

We create a workplace where we feel free to express our opinions and to raise questions and concerns in a safe and supportive environment, without fear of harassment, retribution or retaliation by peers or managers.

Employees shall treat each other with respect and shall not engage in illegal discrimination, harassment, and shall report any and all instances of perceived discrimination and harassment immediately to the Compliance Officer (CO) unless the event involves the CO, in that situation, the report shall be made to any member of the Board of Directors.

We respect legal and ethical non-competition and non-solicitation agreements.

We shall maintain a hotline for anyone to report any concerning behavior with anonymity and without fear of retribution for honest, accurate reporting.

PST shall monitor and avoid conflicts of interest between its Board, officers and employees.

PST prohibits commercial bribes, kickbacks and any other similar payoffs and/or benefits paid to any suppliers or customers.