

Code of Conduct

The Nova Eye Medical Limited (“Nova Eye”) Code of Conduct is intended to guide the behaviour and conduct of all Nova Eye employees. Its purpose is to create a positive workplace culture and to reinforce our commitment to a duty of care to all staff. The code is written as a set of general principles rather than detailed instruction and is designed to underpin and support all organisational policies. The code stands beside but does not exclude or replace the rights and obligations of staff under law.

The code is built on three key behaviours; mutual respect, personal responsibility and duty of care.

1. Mutual Respect

It is essential that all staff recognise and respect the rights and responsibilities of every individual.

In this regard, all staff shall:

- Treat other staff members, business partners and customers with respect
- not allow personal relationships to affect professional relationships
- refrain from all forms of discrimination, harassment and bullying
- Give due credit to the contributions of others
- refrain from acting in any way that would unfairly harm the reputation and career prospects of others
- Intervene constructively where a colleague’s behaviour is clearly in breach of this code
- respect individuals’ rights to privacy
- respect the cultural and social diversity which exists in our global workplace
- Keep personal information in confidence, including information gained through sources outside Nova Eye.
- Use any social medial tools responsibly and respectfully
- Comply with national and international laws

2. Personal Responsibility

Every employee engaged in activities for or on behalf of Nova Eye, shall take personal responsibility in the safeguarding of Nova Eye’s assets, the use of Nova Eye’s resources and in protecting its reputation in the wider community.

In particular, managers and staff shall ensure that:

- The best interests of Nova Eye are maintained at all times
- all confidential and trade secret information of Nova Eye and that provided to Nova

- Eye by collaborators, associated sponsors and partners be kept strictly confidential
- The Intellectual Property of Nova Eye is protected and properly utilised
 - They refrain from representing themselves as spokesperson or as acting on behalf of Nova Eye unless authorised to do so
 - They refrain from engaging in any outside work that would compromise the integrity, commercial viability and independence of Nova Eye
 - nobody uses the resources of Nova Eye for private gain or the gain of a third party other than in a recognised and sanctioned way
 - They maintain the utmost integrity in dealing with all people that come into contact with Ellex
 - Cooperation is fostered at all levels of Nova Eye.

3. Duty of Care

Every employee shall consider the impact of all decisions and actions on the well-being of others, to take reasonable care and to act appropriately to ensure the best interests of Nova Eye and its staff.

Managers and staff shall ensure that they:

- Perform their duties to the best of their ability diligently, impartially and conscientiously.
- Be prepared to report any suspected fraudulent, corrupt, criminal or unethical conduct to an appropriate manager of Nova Eye.
- Comply with Work Health Safety legislation and any associated organisational policies in force at their workplace, to ensure a safe and healthy working environment for all.
- Take suitable measures to avoid, or appropriately deal with, any situation in which they may have, or be seen to have, a conflict of interest arising out of their relationship with a customer, another manager or staff member.
- Take care that their financial and other interests and actions do not conflict or seem to conflict with the obligations and requirements of their Nova Eye position.

- Never demand or request any gift or benefit for themselves or anyone else in connection with their work or activities associated with Nova Eye. Under no circumstances shall gifts of cash be accepted. No manager or staff will accept any gift or benefit that the person offering the gift, or a fair observer, would expect to influence decisions or outcomes in the way that the manager or staff member performs his/her job as a result of the gift. Token gifts and benefits (of a trivial or modest nature, or of insignificant monetary value) shall be accepted only if they are unlikely to be seen as compromising the employee or Nova Eye.
- Be aware that Intellectual Property may be developed either directly or indirectly during

the course of an individual's activities at Nova Eye. Any ideas, innovations or improvement in any form that are a result of work on behalf of Nova Eye will remain the property of Nova Eye unless otherwise agreed in writing.

- Disclose any present or outstanding Intellectual Property obligations to other parties and any inventions that he/she has at the commencement of engaging in activities that shall be excluded from the Intellectual Property assignment agreement required by Nova Eye upon commencement of employment.

3.1 Breaches of Code of Conduct

Breaches of this Code of Conduct will not be tolerated and according to the circumstances of the situation could result in a range of actions involving informal/formal disciplinary proceedings to termination of employment and/or referral to the appropriate authorities.

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