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1 INTRODUCTION

OUR CODE OF BUSINESS CONDUCT (the “Code”) provides guidance to help us make the right decisions and sets our standards of ethical business conduct at OssDsign. It outlines expectations for our employees when dealing with strategic partners, healthcare professionals, and the communities we serve. Except as otherwise required by applicable laws, this Code applies to OssDsign and all our business entities worldwide. The Code is not intended to be an exhaustive list of OssDsign’s policies and procedures.

While the Code applies to all employees and managers, consultants, temporary employees and board of directors are also expected to live up to the principles of the Code.

2 MESSAGE FROM THE CEO

Dear Employees,

Every year our products are helping more patients round the world to achieve a better life, and our aim to get patients back the life they deserve. This ambition gets more real every day as our business is growing and our impact on society is greater. Together we are all an important player of that journey.

It is not only a great privilege, but also a great responsibility. As a supplier of medical products that have the possibility to profoundly touch people’s lives, we stand with our communities and our external stakeholders to ensure that our business practices and operations are in compliance with all laws, take care of our environment, embrace diversity, value employee contribution, and respect basic human rights and appropriate rules for business ethics and professional conduct.

To be able to stand by our responsibilities and the communities we serve, our Code of Conduct is our guiding star. Our Code ensures that we hold ourselves and how we do business to a high standard. The Code sets requirements for business and serves as a foundation for our procedures, guidelines and expected behaviors.

What we do and say matter. Regardless of the job we do, we act with high integrity. We care for the patients we serve, and we respect the people with whom we work. I am proud to be a part of a company that is growing and helping more and more patients each day to get a better life, and to empowering our employees to do the right thing.

I remind you to follow our Code of Conduct and use it as your daily guide. We must all ensure that our words and actions reflect the right behavior. Thank you for doing your part to fulfill the obligations of our Code of Conduct.

Sincerely,

Morten Henneveld
CEO

3 INTEGRITY - we are transparent and honest

At OssDsign, we understand and accept our responsibility to provide our products to patients throughout the globe in accordance with our policies and guidelines and in compliance with all applicable laws and regulations. We recognize that healthcare laws, regulations, and situations involving compliance can be complicated. When faced with a tough decision, we must always consider if the activity is legal, ethical, and consistent with our policies and guidelines, and if we do not know or are unsure, we ask. This is why we have a Code of Business Conduct and provide you with resources to help you understand our standards and expectations, to help you exercise sound judgment and make good choices for not only OssDsign but also all the communities we serve. Please know that you never need to be alone in making these decisions. For your support you have your colleagues, your manager, Human Resources, and the management team.

3.1 Employee Responsibilities

- Always act in a professional, honest, and ethical manner when acting on behalf of OssDsign.
- Be familiar with the information contained in this Code as well as OssDsign's policies.
- Complete all required training in a timely manner and keep up to date on current standards and expectations.
- Promptly report concerns about possible violations of laws, regulations, this Code and policies to your manager, HR or to our whistleblow@ossdsign.com, or to any of the resources listed in this Code.

Remember: No reason, including the desire to meet business goals, is an excuse for compromising our ethics or violating laws, regulations, the Code, or other policies.

3.2 Managers Responsibilities

If you are in a leadership position, you are expected to meet the following additional responsibilities:

- Lead by example: Managers are expected to exemplify the highest standards of ethical business conduct.
- Be an initiative-taking resource for others.
- Communicate to employees and business partners about how the Code and policies apply to their daily work.
- Look for opportunities to discuss and address ethics and ethically challenging situations with others.
- Create an environment where compliance is recognized and valued and where everyone feels comfortable asking questions.
- If you supervise external business partners, ensure that they understand their ethics and compliance obligations.

3.3 Interactions with Our Communities

The healthcare community who influences, recommend, and administer our products as well as those individuals throughout the world who use our products, have placed their trust in us. We work hard every day to deserve that trust and will do business with honesty and integrity—and will comply with all applicable ethical and legal standards. We do not offer or provide bribes or kickbacks to win or influence a business, or to advance our interests with government authorities.

The countries in which we operate have strict anti-corruption rules and regulations that prohibit giving, getting, offering, or asking for anything of value in return for business or for bribing government officials. Many countries also have additional directives such as the European anti-money laundering directives (AMLD) that fight against money laundering and terrorist financing. In addition to these laws and directives, we are also responsible for third parties acting on OssDsign's behalf, and we must perform our due diligence, carefully monitor our business partners, and require them to operate in compliance with our Code and our standards. Due to the complexity of anti-corruption and anti-bribery laws worldwide, it is important that we are all aware of our policies and ask questions if we have any doubts about the proper course of action. If you have questions, contact your manager, HR or Management team.

3.4 Marketing and Business Practices

To help ensure the safe and proper use of our products, information provided to healthcare professionals must be in compliance with all applicable laws and must be approved and reviewed appropriately. We promote our products only for the uses that have been approved, cleared, or authorized by the relevant governmental agency. Healthcare professionals must determine the best course of care for their patients, and OssDsign is committed to providing timely, fair, accurate, and balanced information to assist them with these important treatment decisions.

We never look to gain competitive advantages through unethical or illegal business practices. We do not enter into agreements with competitors to engage in any anti-competitive behavior, including setting prices or dividing markets. We do not engage in unfair or deceptive acts or practices, such as false or misleading advertising or other misrepresentation.

3.5 Fair Competition

OssDsign expects openness, honesty, and courtesy from all employees in their business dealings. Every employee must act ethically and with respect for others, and endeavor to deal fairly and honestly with all vendors, partners, competitors, and the general public.

Each employee is also responsible for creating and sustaining a pleasant, secure, and productive working environment. No employee should take unfair advantage of anyone through manipulation, concealment, abuse or disclosure of privileged information, misrepresentation, or any other unfair dealing practice.

OssDsign also abides by and adheres to fair competition standards that are a matter of law in virtually every jurisdiction in which we conduct business. OssDsign expects employees to act in accordance with such standards, which include compliance with:

all antitrust rules and regulations, including rules against agreements or understandings between OssDsign and its competitors that affect the process, terms, or conditions of sale;

prohibitions against unfair methods of competition and unfair and deceptive acts or practices in commerce; and,

all foreign corrupt practices laws, including those making illegal any offer, payment, promise to pay or authorization to pay any money, gift, or anything of value to foreign officials, political parties, or candidates for improper purposes.

3.6 Business Intelligence

We will never engage in deception or unethical behavior to obtain information about competitors. We should also be careful when accepting information from third parties. We should know and trust

their sources and be sure that the knowledge they provide is not protected by trade-secret laws or confidentiality agreements.

When OssDsign employs former employees of competitors, we recognize and respect the obligations of those employees not to use or disclose the confidential information of their former employers. Make sure you only obtain competitive information through legal and ethical means and respect the confidentiality obligations of others.

Additionally, ensure that you avoid using or disclosing confidential information unless you have obtained the appropriate approvals.

3.7 Ethical Business Partners

OssDsign only works with business partners (e.g., vendors, consultants, distributors) who conduct their business with integrity. Every vendor we hire must uphold our principles and may not engage in unethical or illegal business practices.

Before entering a business relationship, you must ensure that the appropriate due diligence screening has occurred, and that the vendor meets our standards of excellence. Only approve transactions once you fully understand them and are certain that they comply with our policies. Only make payments in accordance with the payment terms as defined in the agreement or invoice. Communicate any issues that are identified to appropriate OssDsign, including Legal, Corporate Compliance, and Finance.

3.8 Conflicts of Interests

While OssDsign does not wish to infringe on the personal lives of its employees, employees must not have personal activities or relationships, including commercial interests, that conflict or appear to conflict with the interests of the Company. A conflict of interest develops any time an employee faces a choice between what is in his or her personal interest (financial or otherwise) and the interest of the Company. OssDsign expects that the interests of the Company will take precedence over an employee's personal interests and that our employees will act only for the benefit of the Company.

A conflict of interest occurs when a person has a competing interest that may interfere with their ability to make an objective decision. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict. Where there is any question as to whether a conflict of interest exists, we should always look to be transparent and disclose such issues or interests. Situations like non-OssDsign outside employment, serving on external for-profit or non-profit committees or other advisory capacity, receiving gifts or benefits from any third party should be disclosed. Since these situations are not always clear-cut, make sure that you disclose any situation that could be perceived as a potential conflict of interest to your manager. Always avoid using your position with OssDsign for personal advantage.

3.9 Gifts and Hospitality

Under appropriate circumstances, a modest gift or a meal to our business partners, healthcare professionals, or the populations we serve may be locally acceptable and compliant. However, if not handled carefully, the exchange of gifts and hospitality can create the appearance of an inducement or a conflict of interest, especially if it happens frequently or if the value is significant under local standards. When it comes to gifts and hospitality, OssDsign's position is straightforward: we do not accept or provide gifts or hospitality or any other item of value if the intent is to improperly influence a business decision. Gifts of cash or cash equivalents are never allowed. Use sound judgment; only provide and accept gifts or hospitality that are permissible by law and policy. Please remember,

providing hospitality and gifts to government employees is strictly prohibited or limited in many jurisdictions. For more information, please speak with your manager, HR or management team.

3.10 Political Activity & Involvement

You have the right to voluntarily and freely participate in your country's political processes, including making personal political contributions. However, you must always make it clear that your personal views and actions are not those of OssDsign.

Avoid even the appearance that you are making contributions or campaigning to gain favor or as an attempt to exert influence. Also, never use OssDsign's funds, assets, services, or facilities to support any political candidate or party, or engage in any lobbying activity unless specifically authorized by OssDsign. Discuss any questions or concerns about political contributions or political activities, with the government affairs team.

3.11 Government Relations and Lobbying

OssDsign will deal with all government agencies in a direct, open, and honest manner.

Most contact with government personnel for the purpose of influencing legislation or rulemaking, including such activity in connection with marketing or procurement matters, is considered lobbying.

Some laws also define lobbying even more broadly to include our normal marketing activities. If your job responsibility is to make marketing contacts on behalf of OssDsign, you are responsible for knowing and adhering to all the relevant lobbying laws and associated gift laws, if applicable, and for compliance with all reporting requirements.

4 HIGH QUALITY- we never compromise quality and safety

4.1 Quality and Safety

OssDsign trusts and empowers its employees to uphold quality as an integral part of their responsibilities in developing, manufacturing, and marketing new and existing therapies. Quality is part of our culture and is integrated into all critical business and decision-making processes. As such, we maintain a demonstrable commitment to the quality, efficacy, and safety of our products in compliance with all applicable global requirements regulating their development, manufacturing, and distribution. Unfavorable results or adverse events involving our products must be reported to regulatory authorities appropriately. Make sure you know and comply with quality and safety policies and report any quality or safety related matter immediately to our quality and regulatory departments.

4.2 International Trade

We comply with all import/export control laws, trade restrictions, and anti-boycott laws without limitation, and we expect our business partners to do the same. You should make sure that you know and comply with these laws when engaging in an international transaction or when releasing certain types of technical data or information to any person. Export control restrictions apply not only to international shipments of tangible materials and equipment, but also to the transfer of intangible technical data to some foreign countries or citizens of those countries. Many countries also have prohibitions against dealing with specifically identified countries, persons, or organizations which must be observed as well as any trade sanctions, embargoes, or other government orders.

4.3 Clinical Research

We are proud of our work to advance healthcare through the clinical research we conduct. To ensure that we abide by all laws, regulations, and our own high ethical standards, we follow all review and approval procedures before initiating research. We will protect the safety of our research participants through appropriate informed consent procedures and good clinical practices, and we will comply with all applicable privacy-related policies and regulations. Anywhere we do clinical research we will ensure that participants are not exposed to unnecessary risk; that they understand the nature and purpose of the research through informed consent procedures; and privacy and confidentiality rules are applied, and the information gathered enables transparent and accurate reporting, interpretation, and verification of clinical results.

4.4 Quality

We comply with all legal and regulatory requirements and industry standards relating to the development and manufacturing of our products including good laboratory practices (GLP), current good manufacturing practices (cGMP), and good distribution practices (GDP) to ensure that our products are manufactured according to the highest standards and are safe and effective. All OssDsign employees are required to report any quality issues associated with a OssDsign product within one business day of becoming aware of the event and appropriate corrective action are then thoroughly taken to prevent violations or quality issues from recurring.

4.5 Safety and Health

OssDsign is committed to providing a safe and healthy workplace. Situations that may pose a health or safety hazard must be reported immediately.

We can only achieve our goal of a safe and healthy workplace through the proactive participation and support of everyone. Make sure you know and comply with safety and health policies and procedures and report all injuries, hazards, and property damage to your manager directly.

4.6 Security

OssDsign is committed to providing a secure workplace for its employees, contractors, and visitors. Any situation that may pose a security risk must be reported immediately. Security is a shared responsibility.

Conduct by a OssDsign that threatens, intimidates, or coerces another will not be tolerated. This prohibition includes all acts of harassment, including harassment that is based on an individual's race, color, religion, gender, gender identity or expression, age, sexual orientation, national origin, disability, pregnancy, genetic information, military status, employment or marital status or any characteristic protected by law. All threats of (or actual) violence, both direct and indirect, should be reported as soon as possible to Human Resources or your manager. This includes threats by employees, as well as threats by business partners, vendors, solicitors, or other members of the public.

5 COMMITMENT

5.1 Interactions with Our Customers and Stakeholders

OssDsign's vision is to provide regenerative solutions to all patients with cranial or spinal bone defects, so they can be restored and healed as naturally as possible. Driven by a commitment to give

patients back the lives they deserve, OssDsign collaborates with surgeons to engineer better healing by integrating biomaterials with clinical design. Headquartered in Sweden, OssDsign supplies hospitals worldwide with implants for use in cranial reconstructions and other orthopedic surgery applications.

We recognize the importance of fully understanding the public health needs of the individuals and communities we serve. In our interactions with government agencies, advocacy groups and other stakeholders, we strive to build relationships based on mutual respect and integrity, and we are transparent in our interactions. Additionally, we only interact with individuals according to the principles and circumstances permitted by company policy and local rules and regulations. Please ensure that our communications and interactions with our stakeholders are appropriate and consistent with applicable company policies and regulatory standards.

6 RESPECT - we treat each other with respect and dignity

We are committed to a workplace where employees feel respected and appreciated. We treat each other with honesty and respect, and fair treatment—this means we treat others as they want to be treated. It is also the basis of our commitment to one another and the key to building successful teams. Keeping this commitment allows us to attract and keep talented individuals in a supportive, professional, and respectful work environment. Maintaining this environment helps OssDsign succeed and creates the setting for each of us to thrive and to reach our full potential. What follows are some of the key areas where we shall be guided by our commitment to our Code of Conduct.

6.1 Human rights

We support fundamental human rights, and we will not work with business partners who employ children or forced labor. We will not tolerate violence or abuse. In every country where we operate, OssDsign follows all laws, regulations, and international conventions related to human rights.

6.2 Anti-Discrimination and diversity

OssDsign has employees with a variety of backgrounds, skills, and cultures. All of our colleagues, job applicants, and business partners will be treated with respect and judged solely on the basis of their qualifications, demonstrated skills, and achievements. We comply with and uphold laws prohibiting discrimination based on any protected characteristic, including non-discrimination based upon a person's race, color, religion, gender, gender identity or expression, age, sexual orientation, national origin, disability, pregnancy, genetic information, military status, and employment or marital status. OssDsign believes that peoples' differences, experiences and unique conditions creates a dynamic and innovative culture where people and our company are able to grow.

6.3 Harassment-free Workplace

We all have the right to work in an environment that is free from intimidation and harassment. OssDsign expects all personnel to adhere to a simple standard: all employees will be treated with respect. Verbal or physical conduct by any employee that harasses or disrupts another's work performance or creates an intimidating or hostile work environment will not be tolerated.

Our Code also prohibits conduct that, although perhaps not unwelcome to the participants, creates an intimidating, hostile or offensive environment for others who observe the conduct.

6.4 Zero Tolerance for Retaliation

OssDsign strictly prohibits reprisals or retaliation against anyone who raises a business practice, ethical or legal issue or cooperates in the investigation of such an issue. We do not tolerate any form of retaliation, whether by a manager or co-worker, against an individual because he or she made a good faith report of a legal or ethical concern. This extends to anyone who assists with or cooperates in an investigation or reports a legal or ethical concern or question. Regardless of the type of misconduct reported, we will not tolerate retaliation against anyone who makes a good faith report of an alleged violation.

6.5 Drug-free Workplace

OssDsign is committed to maintaining a drug-free workplace. Employees who use illegal drugs may be subject to disciplinary action, up to and including termination.

6.6 Correct accounting

Integrity and accuracy are important in everything we do, and this is shown even in our accounting. OssDsign make sure we follow all relevant laws applicable in all parts of our business. All financial data is based on facts and is prepared in good timely manner. We use controls to make sure we have the correct accounting at every given moment.

6.7 Accountability and Discipline

Violating relevant laws, regulations, or the Code, or encouraging others to do so, exposes OssDsign to liability and puts both your own and OssDsign's reputation at risk. OssDsign will take appropriate disciplinary action against any employee or business partner whose actions are violating these policies or any other policies of OssDsign.

7 RESPONSIBILITY - we take responsibility for OssDsign's assets, information, and reputation

7.1 Using and Protecting Company Assets

We are each personally responsible for protecting Company assets and using them with care. Company assets include funds, facilities, equipment, information systems, intellectual property, and confidential information. Personal use of Company assets is discouraged. All information that is sent or received through our computer or phone systems is part of official Company records, and we can be legally required to show those records. Make sure that business information you process is accurate, appropriate, ethical, and legal. OssDsign also believes that every employee is responsible for appropriately securing all Company property within his or her control to prevent its unauthorized use. You must not allow Company property to be used to help carry out illegal or improper activities such as outside employment. OssDsign requires a workplace free of harassment and strives to be sensitive to the diversity of its employees. We also prohibit the use of all computers and communication systems in ways that are disruptive, offensive to others, or harmful to morale.

7.2 Confidential Information

Employees and managers must maintain the confidentiality of confidential information entrusted to them by OssDsign or other companies, including our suppliers and recipients of our products, except when disclosure is authorized by a manager or legally permitted in connection with reporting illegal activity to the appropriate regulatory authority. Unauthorized disclosure and use of any confidential

information is prohibited. Additionally, employees should take appropriate precautions to ensure that confidential or sensitive business information, whether proprietary to OssDsign or another company, is not communicated within OssDsign except to employees who have a need to know such information to perform their responsibilities for OssDsign. That also means sharing to close relatives, spouses, family members and friends. Employees should also remember that their obligation to protect the Company's confidential information continues even after their employment with OssDsign ends. Employees and former employees who improperly use or disclose confidential information will be subject to disciplinary action and legal action, even if they do not actually benefit from the disclosed information.

7.3 THIRD-PARTY CONFIDENTIAL INFORMATION

We are also often in receipt or possession of the confidential information of other parties, including our vendors, recipients of our products, business partners and competitors. Often this information is protected, and its use governed, by confidentiality agreements with those parties. You must treat this information in the same way you treat OssDsign's confidential information. You therefore should refuse unsolicited third-party confidential information or, if inadvertently received, should return such information unopened to the third party or transfer it to your manager for appropriate disposition.

7.4 Data Privacy and Personal Privacy

Many of us have access to personal information related to recipients of our products, healthcare professionals, employees, and others. This information is considered sensitive information and is protected by laws and regulations and must be secured and kept confidential. Protecting personal information that we have been entrusted is not only a legal requirement, but also our commitment and responsibility. If you have any questions about privacy requirements, contact your manager, or Human Resources department.

7.5 Intellectual Property

OssDsign's intellectual property (IP) is an important asset that must be protected. Some examples of our IP are trade secrets, patents, trademarks, copyrights, discoveries, methods, know-how and techniques, innovations, designs, systems, software, data, and technology. Please remember to protect our IP by sharing it only with authorized parties. Additionally, ensure that you only use or disclose confidential or proprietary information with appropriate approvals.

Properly label confidential information to indicate how it should be handled, distributed, and destroyed. You should also promptly disclose to OssDsign any inventions or other IP that you create while you are employed by OssDsign.

OssDsign respects the intellectual property rights of others. Unauthorized use of the intellectual property rights of others may expose OssDsign to civil lawsuits and damages. Therefore, do not use the patents, copyrights, trademarks, trade secrets or other intellectual property of third parties without first ensuring that OssDsign has obtained permission to do so, whether pursuant to a license or otherwise. For more information, please speak with your manager.

For additional information and regulations, we refer to OssDsign's IP-policy that provides the internal procedures for OssDsign AB and its employees for handling and protecting its intellectual property. It also provides guidance for avoiding and/or minimizing the risk of violating the intellectual property rights of others.

7.6 Records and Disclosure

Our Company is subject to extensive and complex reporting requirements. Our operations must comply with all applicable regulatory, accounting, financial and other rules, and regulations in the jurisdictions in which we operate. All of our financial records, accounts, and financial statements must be clear and complete, maintained in reasonable detail, and appropriately reflect our Company's transactions and activities.

7.7 Accurate Information for Investors

Further, as a publicly traded company, all employees have a responsibility to ensure that the Company provides the investing public with information that reflects the Company's business transactions. Therefore, all of our public disclosures that are filed with government agencies or communicated to the public must be complete, fair, accurate, timely, and understandable. In addition, they must be prepared, reported, and maintained in accordance with all applicable laws and accounting standards. This obligation applies to all employees, including all executives, with any responsibility for preparing such reports, including drafting, reviewing, and signing or certifying the information they contain. The Company must communicate to the extent required by government agencies about its operations, without compromising proprietary and confidential information.

7.8 Responsible Communications

Write carefully and clearly in all your business communications, including emails, with the understanding that someday what you write may become a public document. Use common sense when communicating. Be truthful, accurate, and do not embellish with unnecessary opinion. Be clear and avoid ambiguity and always consider how a future reader would interpret your communication. Don't include sensitive data and consider a face-to-face meeting or a phone call as an alternative. Remember, emails and texts are forever. Manage and secure records based on the sensitivity of the information they contain and always comply with instructions from Legal to retain records pursuant to a litigation or investigation hold.

7.9 Communications with the public

To achieve a consistent voice and message when making disclosures or providing information to the public, only authorized persons may speak on behalf of OssDsign. Please note that only designated employees in Executive Management are authorized to speak on behalf of the company to the media and the financial community.

We expect all employees to be careful when using any social media. If you participate in online forums, blogs, or bulletin boards, avoid discussing OssDsign, do not discuss internal or confidential business information, and never give the impression that you are speaking on behalf of OssDsign without prior authorization. Do not send emails or post confidential information or material that could damage OssDsign's reputation. Make sure you never speak publicly on issues involving OssDsign without prior authorization.

7.10 Communications to our investors

We are required under U.S. federal securities laws and European laws to provide our shareholders and the public with periodic disclosure regarding our business and financial condition (such as quarterly and annual reports and materials for our annual shareholders meeting). We provide additional disclosures through our quarterly reports, earnings calls and press releases. All OssDsign employees who participate in the preparation or dissemination of these disclosures, or who provide information that they know may be used in the preparation of these disclosures, have a legal and ethical duty to ensure that the content of the disclosures is accurate, complete, and timely.

If you become aware that our public disclosures are not accurate, complete, and timely, or become aware of a transaction or development you believe may require disclosure, you should report the matter immediately to your manager and HR.

7.11 Insider Trading

OssDsign is proud when our employees choose to invest in the Company. Personal investment is an effective way to align the interests of employees with the interests of our shareholders. When buying or selling Company shares, all employees, directors, officers, and other “insiders” should be mindful of the legal and policy limitations on trading.

We will not use information concerning OssDsign or information from our business partners for personal benefit. Insider Trading prohibits all of our employees and temporary staff worldwide, as well as their immediate family members, from trading securities, or disclosing or passing along information to others who then trade on the basis of material nonpublic information. You may only purchase or sell a company’s securities if you are not in possession of material non-public information about such company. Certain individuals are subject to additional trading restrictions, which limit those individuals to trading in the Company’s securities only during certain open trading windows.

Material information is information that a reasonable investor would consider important in deciding whether to buy, sell, or hold a security. Information is generally considered “public” after it has been publicly available for at least one business day after disclosure. Violations of the insider trading laws are severe and include civil and criminal fines and penalties. It is your responsibility to ensure that you do not violate the insider trading laws.

8 Resources for taking action

OssDsign is committed to creating a workplace conducive to the open discussion of its business practices. If you see or suspect any illegal or unethical behavior or policy violation, or you have a question about what to do in a certain situation, you have a responsibility to speak up. Remember, an issue cannot be addressed unless it is brought to someone’s attention. Examples of matters that should be reported include violations of accepted industry codes, bribery or corruption, inappropriate financial reporting, or harassment. You are encouraged to share your concerns with any person with whom you feel most comfortable, including your manager or any other member of management or Human Resources. Please feel free to go to the resource that you are most comfortable with, but keep in mind that your best resource is often your immediate manager.

Any report or information that you submit must be made in good faith. This does not mean that you must be certain or correct when you raise a concern, but it does mean that you believe the concern you are raising is legitimate and the information you are providing is accurate. For general compliance questions or for questions relating to raising a concern, please feel free to contact any member of the management team.

Concerns about Human Resources related policies, procedures or regulations or matters regarding personal conduct should be brought to the immediate attention of Human Resources. Suspected Code violations that relate to financial statement disclosures or accounting, internal control, or auditing matters, should be reported directly to the Chairman of our Board.

If an employee feels uncomfortable speaking with any of the above resources for any reason, the Company has established a “Whistleblower” procedure by which confidential complaints may be raised anonymously to whistleblow@ossdesign.com. Complaints submitted through this confidential process will be presented to the Chairman of the Board, if they involve the Company’s accounting, auditing and internal controls and disclosure practices, or for other non-financial related matters. Anyone may utilize this confidential and anonymous process either to raise new concerns or complaints or if they feel that a concern or complaint previously raised has not been appropriately handled.

NOTE:

If you have a question or concern regarding human resources matters that do not fall within the scope of this Code or the related policies and procedures of OssDsign, please refer such question or concern to the Human Resources department.

8.1 Disciplinary Actions

The Company shall determine whether violations of this Code have occurred and, if so, shall determine the disciplinary measures to be taken against any employee who has violated this Code.

8.2 Waivers and Amendment

Generally, the policies contained in this Code must be strictly adhered to and no exceptions can be allowed; however, there may be some cases where an exception may be appropriate. Any employee or officer who believes that a waiver of any of these policies is appropriate in their case should first contact their immediate manager. The Company reserves the right to amend, alter, or terminate this Code at any time for any reason.

Thanks once again for upholding our code at OssDsign.

Morten Henneveld

CEO
