

**Novutech LLC**  
**Code of Business Ethics**

1. **Commitment to Integrity**  
We are committed to conducting our business with the highest standards of integrity and honesty. We will not engage in any form of bribery, corruption, or unethical behavior.
2. **Compliance with Laws and Regulations**  
We are committed to complying with the applicable laws and regulations governing our industry, including those related to anti-corruption, healthcare and product safety.
3. **Accountability**  
We are committed to best practices in our dealings with healthcare professionals, regulatory authorities, and business partners. We are accountable for our actions and decisions.
4. **Respect for Healthcare Professionals**  
We respect the roles of healthcare professionals and do not engage in practices that could influence their independent judgment. We are committed to interactions that are ethical and appropriate.
5. **Quality and Safety**  
We are committed to distributing only high-quality, safe medical devices. We seek business relationships with manufacturers and suppliers that adhere to best industry standards and regulations to ensure the safety of patients and healthcare providers.
6. **Confidentiality**  
We are committed to protecting the confidentiality of sensitive information related to our business operations, partners, and customers, and to handle all data in accordance with applicable privacy laws.
7. **Fair Competition**  
We are committed to competing fairly and ethically in the marketplace. We do not engage in practices that harm competitors or mislead customers.
8. **Responsibility to Stakeholders**  
We recognize our responsibility to our employees, customers, partners, and the communities we serve. We strive to create a positive impact and contribute to the well-being of society.
9. **Reporting Violations**  
We encourage employees and partners to report any unethical behavior or violations of this Code. Reports will be taken seriously and handled with confidentiality.
10. **Continuous Improvement**  
We are committed to continuous improvement in our ethical practices and compliance efforts, regularly reviewing and updating our policies to reflect best practices.

By adhering to this Code, we aim to foster a culture of ethics and integrity within our organization and throughout our business relationships.