
CODE OF CONDUCT

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MESSAGE FROM OUR CEO

Welcome to Argon!

On behalf of the Argon Family, I would like to personally welcome you to the Argon Medical Devices Company and look forward to the many contributions you will lend to the success of our organization.

Argon has seen dramatic growth over the past couple of years through a series of acquisitions and expansion of our new product development, manufacturing, sales and distribution footprint.

It is the focus of Argon to become the market leader, on a global basis, in all our critical product segments.

To ensure our growth, Argon bases many of our decisions on its Core Values of Integrity, Respect, Responsiveness, People and Results:

- We do things the right way
- We treat others the way we want to be treated
- We operate with a sense of urgency and accountability
- We attract, develop and retain top talent
- We deliver exceptional outcomes

Argon's commitment in serving its customers and providing quality products is at the forefront of our business. We improve the lives of patients and caregivers through the innovation, manufacturing and delivery of best-in-class medical devices and superior service.

This Code of Conduct provide a solid framework in which customer interests and employee interests are served.

Again, welcome to Argon and I look forward to working with you and wish you much success as a member of the Argon Family.

Best regards
George A. Leondis
President and CEO

OUR MISSION AND VALUES

Company Mission Statement

We improve the lives of patients and caregivers through the innovation, manufacturing, delivery of best-in-class medical devices, and superior service.

Argon Core Values

INTEGRITY, RESPECT, RESPONSIVENESS, PEOPLE, RESULTS

- We do things the right way
- We treat others the way we want to be treated
- We operate with a sense of urgency and accountability
- We attract, develop and retain top talent
- We deliver exceptional outcomes

As employees of Argon Medical Devices, Inc., we commit ourselves to:

A Achieve Mission and Goals through:

R Regulatory compliance

G Good manufacturing practices

O Ongoing process improvement

N Never compromising quality

T Timely delivery

E Enhanced customer satisfaction

A Accurate operations

M Maintaining safe work environment

UNDERSTANDING ARGON'S CODE OF CONDUCT

This code applies equally to all employees, officers and directors of Argon Medical Devices, Inc. and its affiliates, and only our Chief Executive Officer may grant waivers to Company employees.

Your Role

Employees and directors shall be held accountable for their adherence to this Code. Failure to observe the terms of this Code may result in disciplinary action, including termination of employment. Violations of this Code may also constitute violations of law and may result in civil or criminal penalties for employees, directors, and the Company.

Employee Responsibilities

- Act ethically and comply with the Code and any laws, regulations, and policies relevant to your job
- Cooperate with internal investigations
- Speak up if you suspect or see misconduct or violations of the Code
- Ask questions

Leadership Responsibilities

- Follow and abide by employee responsibilities
- Serve as a role model for others to follow – lead by example
- Communicate the Code and information about ethics and integrity to your team
- Escalate violations or suspected violations of the Code
- Abide by Argon's Zero - Retaliation Policy

Ethical Decision-Making

Recognizing ethical issues and doing the right thing in all business activities is your responsibility. When engaging in business activities for Argon, consider the following:

- What feels right or wrong about the planned action?
- Is it based on a thorough understanding of the possible consequences?
- Is the planned action consistent with the Code and Company policies?
- How will the planned action appear to your manager, Company executives, the Board, or the public?
- Would another person's input help to evaluate the planned action?

Importance of Asking Questions

Argon believes that acting with integrity means always being accountable and truthful, and doing the right thing. While this sounds simple enough it sometimes can be difficult in practice. We work in a very complex environment where we may encounter situation with unclear or conflicting goals.

When you have questions about whether an action is lawful or complies with our Code, seek advice. Depending on the circumstance, you may see advice from a coworker, your manager or supervisor, an HR representative. Always ask questions when you are unsure of the right course of action.

Sharing Concerns

Employees must report all existing or potential violations of the Code or any other suspected unethical, illegal, or suspicious behavior promptly. Options for reporting your concerns include:

- Your supervisor or manager
- Human Resources
- Legal Department
- Calling our ethics hotline

What happens when a Report is Made?

Reported concerns regarding company policies will be investigated. Argon's process for investigation includes:

- Investigators will be assigned who are experts with the right objectivity
- The investigation will be conducted determining the facts through reviewing documents and/or interviews
- The investigation team if needed will recommend corrective actions to the appropriate managers for implementation
- Feedback of the outcome, if appropriate, will be given the person who raised the concern

Zero Retaliation

- Argon will not retaliate anyone who asks questions or reports a concern in good faith and will protect the anonymity of anyone who makes a report to the extent practicable
- Any employee who engages in retaliation against another who raises concerns will face disciplinary action
- All employees are obligated to report suspected violation of the Code and or other misconduct

ARGON AND THE WORKPLACE

Respecting Others

Argon prohibits harassment and discrimination of any kind, including behaviors that create an intimidating, hostile, or offensive work environment. We treat others with respect even if we do not agree with them, and we do not tolerate harassment or discrimination in any form.

All employees must embrace the following:

- Accept and value personal differences
- Treat everyone fairly
- Do not create a hostile or offensive environment
- Don't discriminate against any person, including based on these characteristics:
 - Race, religion, creed, color, sex, pregnancy, maternity, marital or family status, age, physical or mental disability, ancestry, genetic information, national or ethnic origin, citizenship status, sexual orientation, gender identity or expression, political belief, trade union membership, veteran status, or any other status protected by applicable federal or local laws

Workplace Environmental Health and Safety

The health and safety of all employees and protection of our environment is a top priority in all our locations. We must do what is necessary to prevent workplace injuries, illnesses, and environmental violations by:

- Following all applicable environmental, health, and safety laws and regulations
- Complying with applicable Company Environmental Health and Safety (EHS) policies and procedures in all our facilities
- Reporting, tracking, and developing corrective and preventive actions
- Conducting ourselves in a safe and responsible manner, according to EHS best practices
- Taking all reasonable precautions when handling hazardous or unsafe materials, and when operating machinery and equipment
- Working to continuously reduce workplace hazards and environmental impacts
- You should immediately report any behavior or activity that you believe jeopardizes the safety of your workplace or the environment. For additional information, contact your EHS representative or your supervisor

Keep Accurate Records

All business records, regardless of whether in paper or electronic, must be complete, accurate and reliable in all material respects.

Examples of business records include, booking information, payroll, timecards, travel and expense reports, emails, accounting and financial data, electronic data files, records maintained in the ordinary course of business. "Records" includes all paper and electronic documents and files.

Records must be maintained stored in accordance with applicable laws, regulations, and policy.

Protect Confidential Information & Intellectual Property

Confidential information is information that is not known to the public and should never be shared with third parties or anyone who does not need to know the information for their job. Company information must remain confidential except when disclosure is authorized or legally mandated.

Confidential information includes but is not limited to:

- Sales and Marketing information
- Financial information
- Strategic information
- Supplier information
- Human Resources information
- Intellectual property information
- Legal information

Argon's intellectual property is one of our most valued assets and must always be protected. IP includes copyrights, patents, know-how, trademarks, trade secrets, design rights, logos, expertise and other intangible industrial or commercial property. We must also respect the IP belonging to third parties and never knowingly infringe upon the IP right of others.

Data Privacy

We must handle all personal data responsibly and in compliance with applicable privacy laws and Company policies.

Personal data is information that can directly or indirectly identify an individual or could be used to identify a person. Name, employment history, social security number, medical history, or physical address are all examples of personal data.

Safeguarding our resources

It is your responsibility to keep Argon's assets safe from loss, theft, damage, inappropriate use, or other forms of fraud. If you suspect theft in the workplace or are aware of misuse of Company assets, report it immediately.

MARKETPLACE

Interactions with Healthcare Professionals

Healthcare professional (HCP) is defined very broadly to cover any person or entity involved in the provision of healthcare services or items to patients and includes:

- Clinicians (physicians, nurses techs, etc.)
- Hospitals
- Outpatient-based labs
- Individuals involved in the decision to prescribe, purchase or lease our service or products

Argon is part of the dynamic medical device industry highly regulated by several governments, regulatory bodies, and industry groups worldwide

HCPs determine the course of care for their patients.

- We provide fair, accurate and balanced product information, scientific and medical information, and safety information

We take special care to avoid even the appearance of influencing HCPs' decisions.

- Inducements can include gift, money, or anything of value, except where permitted by law

We present our products only for the uses that have been approved, cleared, or authorized by the relevant agencies and not for unapproved off-label uses.

We respond to requests for information about off-label uses of our products via our Regulatory Affairs organization.

Don't Trade on Inside Information

We may become aware of inside information about Argon or companies with which we do business and cannot trade on such information unless it is public, or engage in other action to take advantage of that information. Consequences for insider trading can be severe and include criminal and civil penalties.

Examples of inside information include:

- Information about business deals (e.g., mergers, acquisitions, etc.)
- Financial results
- Important management changes
- Major raw /material shortages
- Gain or loss of a significant customer or supplier
- Major lawsuit or regulator investigation

Gifts and Entertainment

It is Argon's policy to observe the highest standards of ethics, honesty, and integrity. Employees are required to uphold these standards. They must not have any personal financial interest that conflicts in any way with the interest of the Company or its shareholders. They must obey all applicable laws.

The giving or accepting of bribes, inappropriate, lavish, or repeated gifts (e.g., wine, liquor, jewelry, expensive entertainment tickets or outings), or other benefits is always prohibited, even if acceptable by local custom.

Requesting or soliciting gifts or services, or requesting contributions from vendors, suppliers or other business partners for yourself or for Argon, is prohibited, except for charitable organizations sanctioned or supported by our Company.

It is appropriate to accept modest hospitality, such as routine business meals, while engaged in business purpose, if hospitality:

- Is done in accordance with Company policies
- Is done in a manner which could not be construed as improperly influencing good business judgement
- Reflects a bona fide business need

Rules for giving gifts to health care professionals, customers and government officials are much stricter, and some jurisdictions have restrictions on providing meals and gifts to healthcare professionals.

Avoid Conflicts of Interest

A conflict exists when your personal interests or those of a family member are incompatible with the interest of Argon. Conflicts of interest expose increased scrutiny and criticism, undermining our credibility and trust that others place in us.

Every employee should avoid conflicts of interest when dealing with third parties and or disclose any personal relationships with third party representatives.

All are expected to advance the Argon's business interests when the opportunity arises. You may not take for yourself (or direct to a third party) a business opportunity that is discovered using Argon property, information or position, unless Argon has already been offered the opportunity and turned it down and you obtain approval from your manager. More generally, employees are prohibited from using corporate property, information, or position to compete with the Company.

Examples of potential conflicts of interest:

- Owning, directly or indirectly, a financial interest in an entity that does business, seek to do business, or competes with Argon
- Holding a second job that interferes with your ability to do your primary job
- Employing, consulting, or serving on the board of a competitor, customer, supplier, or service provider
- Hiring a supplier, distributor or any agent managed or owned by a relative or close friend
- Soliciting or accepting any cash, gift, entertainment or benefits from any competitor, supplier, or service provider

Be Honest, Open, and Fair

Argon competes by providing superior product and service, never by engaging in unethical or illegal business practices.

Argon is committed to dealing fairly with its employees' customer, suppliers, and competitors.

You are prohibited from taking unfair advantage through manipulation, concealment or material facts, or any other unfair business practice.

Don't Make Improper Payments

No employee of Argon, agent or independent contractor acting on our Argon's behalf may offer or provide bribes or other improper benefits to obtain business or an unfair advantage. A bribe is defined as directly or indirectly offering anything of value to influence or induce action, or to secure an improper advantage.

Bribes can take many forms:

- Money
- Gifts
- Unreasonable entertainment or hospitality
- Kickbacks
- Unwarranted rebates or excessive commissions
- Political or charitable contributions
- Anything else of value

We expect every employee acting on Argon's behalf to strictly abide by all anti-bribery and anti-corruption laws, including local laws in every country we do business.

Argon is committed to full compliance with anti-money laundering laws throughout the world and will conduct business with reputable customers and partners who are involved in legitimate business activities and transaction.

All employees have the duty to report to the General Counsel any situation that is suspicious or inappropriate and not to alert the organization or individual with whom you have a relationship of any impending or ongoing investigation.

Compete Fairly

Antitrust and competition laws prohibit efforts and actions to restrain or limit competition between companies that otherwise would be competing for business in the marketplace. All must be careful when you are interacting with Argon's competitors.

Avoid discussing the following with competitors:

- Prices or pricing strategy or discounts
- Structuring or manipulating bids
- Comparing bids or agreeing not to bid
- Knowingly submitting noncompetitive bids
- Terms of our customer relationships

- Sales policies
- Marketing plans
- Customer selection
- Allocating customers or market areas
- Contract terms and strategies

Argon does not condone entering 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 misleading advertising, or other misrepresentation.

OUR COMMUNITIES

Communicating with External Parties

Argon employees are not authorized to speak with the media, investors, or analysts on behalf of Argon unless authorized by our Chief Executive Officer.

Do not give the impression that you are speaking on behalf of Argon in any communication, especially those that may become public, unless expressly authorized.

This includes posts to online forums, social media sites, blogs, chat rooms and bulletin boards. Where appropriate, use a disclaimer such as: "The postings on this site are my own and don't necessarily represent positions, conclusions or opinions of my employer, Argon." This is to prevent the appearance that you speak for or represent the Company officially.

This also applies to comments to journalists about specific matters that relate to our business as well as letters to the editor and endorsements of products or services.

Social Media

Argon encourages communication among our employees, customers, and others via a wide range of forums for the purposes of learning and sharing information with our stakeholders, as well as with the public.

It is important to remember when utilizing the many platforms of social media to think about the effect statements you make will have on your audience. Do not make any abusive, objectionable, or inflammatory posts on social media.

Internet, Company-provided equipment (e.g., cell phone, laptops, computers) and services may not be used for transmitting, retrieving or storing any communications in a way that violates the Company's Equal Employment Opportunity, Anti-Harassment, or Anti-Violence in the Workplace Policies.

Employment postings on Internet sites and social media such as Facebook and Twitter may include the fact that you work for Argon, your job title, and a high-level job description with office location.

You must never disclose confidential and/or proprietary information about our business, our suppliers, or our customers and remember to note that you are not speaking on behalf of the Company.

You should never use social media to promote off-label uses of our products and technologies, including by liking or retweeting others' content.

Employees should respect the laws regarding copyrights, trademarks, rights of publicity and other third-party rights. The following actions are prohibited: engaging in any illegal activities, including piracy, cracking, extortion, blackmail, copyright infringement, and unauthorized access of any account that is not yours. Do not infringe on the Company's logos, brand names, taglines, slogans, or other trademarks.

Social Responsibility

We expect all employees at Argon to work hard and operate with integrity by making good choices and doing the right thing in all aspects of our business. We will continually challenge ourselves to define what being a responsible company means to us and work to translate our definition into behavior and improvements.

We will always seek to align our social and environmental efforts with our business goals.

Environmental Stewardship

Employees whose work affects environmental compliance must be familiar with the permits, laws and regulations that apply to their work.

Argon continues to use energy efficiently and to employ technology to minimize any risk of environmental impact.

All of Argon employees are responsible for making sure Argon business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

Human Rights and Fair Labor

We are committed to upholding fundamental human rights and believe that all human beings around the works should be treated with equality, dignity, fairness, and respect.

Argon does not use or condone the use of slave labor or human trafficking, denounces all degrading treatment of individual or unsafe work conditions.

Argon is committed to following all applicable wage and hour laws and regulations. Anyone paid based on hours worked must report and record all time worked accurately in accordance with established local procedure.

REPORTING OPTIONS

Whistleblower Statement

Argon desires to alert the management of the Company of a serious violation of internal policies or external laws or regulations. The Company welcomes such information and considers it essential to preserving its reputation and long-term viability. Argon is committed to compliance with all applicable laws, regulations, and policies.

Compliance is only possible if all employees follow all applicable laws and regulations and all internal policies. When in doubt as to the appropriate course of action to take, employees should seek guidance from their supervisor, manager or a member of the executive management team.

Open Communication Statement

The leadership team of Argon is dedicated to maintaining an environment that encourages open communication between employees and the leadership team.

We believe the best way to solve any issue is through face-to-face discussions with you, the employee. Therefore, we work directly with you and other employees on matters relating to your jobs and your workplace when we are aware of your concerns and issues. We consider you very capable of speaking for yourselves and encourage you to do so at all levels of the organization.

We believe every employee has a critical contribution to make in our Company. Employee involvement is accomplished through direct information sharing and problem solving. Our success will be the result of working together as a team toward a common focus and continuous improvement accomplished by:

- Awareness of our business challenges and opportunities
- Awareness of your concerns and issues
- Direct communications between you, the employee, and the leadership team

We encourage you to openly communicate with the Company. Your local Human Resources Representatives are available to discuss with you any issues you may have.

EMPLOYEE CODE OF CONDUCT - ACKNOWLEDGMENT AND RECEIPT

I understand and agree to the representations in this Employee Code of Conduct form as follows:

I have received my copy of the Employee Code of Conduct and I understand that it is my responsibility to read and comply with the policies contained in this Handbook and any revisions made to the Code of Conduct.

In the event of a conflict between this Code of Conduct and any local plant policies, practices or rules, the local plant policies, practices or rules shall govern. Finally, Argon reserves the right to modify, suspend or revoke any of its policies, procedures or practices as set forth in this Code of Conduct, with or without notice

Signature: _____ Date: _____

Printed Name: _____