

**Science and Clinical Evidence – Financial Success – Passion and Commitment – Ethics and Responsibility**

Nexstim Plc is a Finnish, globally operating growth-oriented medical technology company. Our mission is to enable personalized and effective diagnostics and therapies for challenging brain diseases and disorders. Responsible business conduct and integrity are cornerstones for the success of Nexstim and part of our most important values.

Part of responsible conduct are our daily operations and how we treat and respect each other, as management, as supervisors, as colleagues, as customers and as other stakeholders. Operating in an increasingly globalized world, our responsibilities are global. We consider not only local laws and regulations, but also the regional cultures in all areas in which we operate.

Nexstim has a strong corporate culture that values employees and mutual trust. We value every employee, respect human rights and want to promote equality in every way. We are committed to building a strong corporate culture and ensuring a motivating and supportive work environment based on security, openness, equality and trust. Responsible business conduct is a requirement in all our operations, and we always work for the best of Nexstim. We comply with laws and regulations, work transparently with stakeholders, and behave responsibly in the business environment and society wherever we operate. We provide patients and users with the safest and most effective products possible, based on scientific and clinical evidence.

Integrity, honesty and transparency in all our operations are crucial to the reputation and success of Nexstim. Every Nexstim employee is responsible for our integrity and reputation.

This Code of Conduct is part of our daily operations and corporate culture throughout Nexstim Plc, and every Director, supervisor and employee is expected to behave in accordance with Nexstim's policies. Nexstim's Board of Directors has approved our Code of Conduct, and monitors compliance with it through management, supervisors and employees throughout Nexstim Group. All Nexstim employees, business partners and stakeholders are encouraged to report suspected violation of these ethical principles, laws and regulations. We believe that transparency and whistleblowing encourage a responsible business conduct at Nexstim. We investigate all compliance concerns accurately, anonymously, and fairly using established procedures.

Mikko Karvinen, CEO

## 1. Our People – Nexstim's Employees

- Our People are the key to our success
- We prioritize health and safety
- We respect and promote Human Rights, equality and diversity
- We condemn all harassment
- We comply with labour legislation and respect collective bargaining agreements

### Our People

Nexstim's business is based on the skills, knowledge and experience of our employees. Nexstim actively seeks to promote a work culture where employees are assessed based on qualifications and merit without discrimination or harassment. We encourage continuous development of professional skills, competences and qualifications in order to ensure high quality work.

### Health and Safety

We want to guarantee safe and healthy working conditions for all our employees. The health and safety of our employees is a key responsibility of every supervisor and employee. Our health and safety representative and task force, as well as our occupational health contact person are actively working to develop and maintain safe and healthy working conditions.

### Human Rights

We respect and promote basic Human Rights and international labour standards. We strongly condemn both child labour and forced labour. We expect our suppliers to share these values and act accordingly.

### Equal Opportunities and Anti-Harassment

Nexstim requires all employees to treat each other and other stakeholders in a respectful, equal, and fair way. We condemn any form of harassment, discrimination, as well as threatening, intimidation and humanly degrading behaviour. We expect all superiors and other employees to treat each other with mutual respect and honour everyone's right to privacy and dignity.

## 2. Responsible business conduct

- We always act in Nexstim's best interest
- We comply laws and regulations
- Product safety, quality and research
- We report and record accurately
- Protection of intellectual property rights and confidentiality of trade secrets
- We maintain mutually beneficial relationships with our business partners
- We interact openly with authorities and stakeholders
- We protect the environment

**Acting in the best interest of Nexstim**

Financial success is a key value, and we are always committed to acting in the best interest of Nexstim. All actions taken and decisions made by each director and employee must be commercially justifiable and in the best interest of Nexstim. Furthermore, they need to support profitable and sustainable growth of Nexstim, in a way that ensures the fulfilment of the Company's strategy.

**Accuracy of Records and Reporting**

We are committed to complying with all laws and regulations of the country in which we operate. Nexstim operates in accordance with the principles established by the quality system and strictly and honestly complies with all applicable rules and standards related to accounting and the reporting, recording and disclosure of financial or other information.

**Product Safety, Quality and Research**

We develop and deliver effective and safe products for the benefit of the patient. Our products are safe, reliable and of high quality. We are committed to continuously improving the quality, reliability and safety of our products and striving to minimize the environmental impact of our manufacturing. Every step and development process in Research & Development is carried out in accordance with internationally accepted standards. Research plans and protocols are evaluated and approved in compliance with legal requirements. Data from clinical trials are processed and stored confidentially and in a way that allows for correct and transparent reporting. The clinical results are published in a truthful manner.

**Protection of Intellectual Property Rights and Confidentiality of Trade Secrets**

Nexstim seeks to comprehensively protect its confidential information, intellectual property rights and future innovations from its research. We also respect the intellectual property rights and confidential information of others, and we do not attempt to obtain them by illegal means. Nexstim is further committed to safeguarding the confidential information and trade secrets of our business partners in accordance with the agreements, applicable laws and regulations.

**Business Partners**

Nexstim develops and maintains mutually beneficial relationships with its suppliers, customers, business partners and other stakeholders. Our business relationships are based on honesty, integrity and trust. Nexstim expects its business partners to share the Company's values. Our suppliers must act responsibly and fully respect the following values and principles: compliance with all applicable laws, prohibition of corruption, respect for human rights, including prohibition child labour and forced labour, and compliance with environmental standards and sustainable development.

**Relations with Authorities and Government – Political Activity**

Nexstim engages actively and transparently in the communities where the Company operates. We promote the well-being of communities for instance by paying taxes, providing direct and indirect employment and through community involvement. We do not support political parties or organization in any way, nor do we participate in funding or supporting election campaigns of individual candidates.

### 3. Promoting Ethical Behaviour

- We condemn any type of corruption or bribery
- We minimize conflicts of interest
- Responsible and accurate communication
- Prohibition of misuse of inside information
- Respect for privacy
- We encourage employees, business partners and other stakeholders to use our Whistleblowing channel

#### **Anti-Corruption and -Bribery**

Corruption and bribery are always devastating for a business environment, hence do we not accept any form of it. We act in a fair way, and we do not offer improper benefits to others. We also expect our business partners and suppliers to strictly refrain from engaging in corrupt activities when providing services to us or on our behalf.

#### **Conflicts of Interest**

It is the responsibility of all Nexstim directors, supervisors and employees to always make business decisions in the best interest of the company and all its shareholders. Any unreasonable decision will jeopardize Nexstim's integrity, interest, reputation and profitability. Potential conflicts of interest are sought to be recognized and dealt with transparently.

#### **Responsible Communication**

The general principles of our internal and external communication are timeliness, consistency, equality, transparency and accountability. We take into consideration all applicable laws and regulations as well as the rules and guidelines of the Nasdaq First North Growth Market.

#### **Misuse of Inside Information**

Nexstim is listed on the Nasdaq First Nordic Growth Market in Finland and Sweden. We comply with securities market laws, the EU Market Abuse Regulation and other applicable rules and guidelines that prohibit employees, management and board members from directly or indirectly engaging in insider trading or disclosing insider information without authorization.

#### **Respect for Privacy**

We respect the privacy of our directors, supervisors, employees and other stakeholders associated with the Company, and prioritize the confidentiality of personal information. Personal data is collected, used and processed only for legitimate business purposes in accordance with data privacy laws. Personal data may only be used by individuals with a clear business need for the information.

#### **Whistleblowing Channel**

We encourage our employees, business partners and other stakeholders to report the matter if they suspect that someone is violating the law or Nexstim's ethical principles. More information on Nexstim's whistleblowing channel can be found at [www.nexstim.com](http://www.nexstim.com).