



# ETHICS MANUAL

## Dear team member:

I am pleased to introduce you to our Code of Ethics

Quality-1 Export, Inc. with its Quality-1 Holding, Inc. company with headquarters in Miami, as well as their branch offices and affiliates, have engaged for over 35 years in the field of health in Central America and the Caribbean, serving the segments of Orthopedics, Dentistry, Cardiology, Spine, Transfusions and Pharmaceuticals through the representation of leading brands in the field.

This document constitutes the specific expression of our culture and ethical values. It implies a conduct and behavioral guide, and it reaffirms our will to preserve the best honesty and integrity standards. It also helps us improve what we were already doing right.

It is clear for all that corporate ethics has become an essential part for the sustainability of our organizations, as well as for contributing in a positive way to the industry we work for.

Therefore, this Code is highly important for all of us who work for Quality-1 Holdings. It is also expected that its sub-distributors, sales agents and other independent agents follow the Code when acting on our behalf or benefit (hereinafter called collectively "Business Partners"). It is important that all team members and business partners read, understand and follow the Code.

We have created a Code that successfully contains the following:

- The ethical values that will guide our actions.
- The expected behavior with our significant stakeholders.
- Specific principles and conduct expected by the stakeholders.
- Guidelines for compliance with the Code and channels for communicating concerns, doubts or feedback

The importance of asking questions

If you are not sure if a specific activity complies with the Code, ask yourself:

*"Would this activity have positive repercussions for Quality-1 Holdings?" "Would I feel comfortable if this activity were known publically?"*

If the answer to any of these question is "no" or "I don't know", ask for advice to the Quality-1 Holdings Compliance Department, Legal Department or Direct Headquarters.

Likewise, we are at your disposal for any consultation, comment or clarification concerning the code.

Sincerely,



Rene Portela  
President and CEO

A handwritten signature in blue ink, appearing to read "Rene Portela", written over a light blue background.

## Table of Contents

Our Vision.....	<b>Error! Bookmark not defined.</b>
Our Mission.....	<b>Error! Bookmark not defined.</b>
Our Values.....	<b>Error! Bookmark not defined.</b>
Our Competences .....	<b>Error! Bookmark not defined.</b>
Introduction .....	6
Our team members constitute our most important asset. ....	6
Contracts and development .....	6
Diversity at the workplace .....	6
Section 1.....	6
Commitment of our team members.....	6
Behavior in the workplace and mobbing.....	7
Health, safety and environment .....	7
Business courtesies (for example, gifts and meals) .....	8
Conflicts of interest.....	8
Corporate Opportunities.....	<b>Error! Bookmark not defined.</b>
Corporate Registers .....	<b>Error! Bookmark not defined.</b>
Use of Corporate Files.....	9
Copyright materials and computer software.....	9
Undue payments.....	<b>Error! Bookmark not defined.</b>
Competition, fair deal and anti-trust .....	10
Section 2.....	11
Acting with integrity.....	11
Interactions with healthcare professionals (HCP) .....	11
Section 3.....	12
Excellence in regulation and quality compliance.....	12
Our commitment to quality .....	<b>Error! Bookmark not defined.</b>
International Commercial Restrictions .....	<b>Error! Bookmark not defined.</b>
Government Inspections and investigations .....	<b>Error! Bookmark not defined.</b>
Section 4.....	13
Advertising and Marketing Practices .....	13
External communications and Commitment .....	13
Quality-1 Holdings Confidential or Protected Information.....	13
Benefits and educational or humanitarian resources .....	<b>Error! Bookmark not defined.</b>

Political Process and contributions .....	<b>Error! Bookmark not defined.</b>
Notice of violation or suspected violation .....	<b>Error! Bookmark not defined.</b>
Section 5.....	15
Use of the Code.....	<b>Error! Bookmark not defined.</b>
Policy of no reprisal.....	<b>Error! Bookmark not defined.</b>
Conflicts.....	16
Exemptions and modifications.....	16

## Our Vision

To be the leading company in the countries where we participate in the distribution of medicines, medical devices and supplies of the highest-quality and the most prestigious brands.

## Our Mission

To provide global quality products and services with passion and professionalism, always searching for the best benefits of our clients and their patients.

Our company seeks to be a leader that complies effectively and profitably by establishing bonds of trust and satisfaction in the communities and sustainability through time.

## Our Values

1. **Integrity:** “We are committed to honesty and transparency in our actions”
2. **Service:** “We work with passion as a team in order to reach our goals”
3. **Excellence:** “We fulfill the expectations of our clients and reward with justice the efforts and loyalty of all the members of our team”
4. **Perseverance:** “We are committed to tenacity until we conclude what we set ourselves to do with responsibility”
5. **Respect:** “We promote a healthy and peaceful coexistence between the members of our company and society”
6. **Innovation:** “We strive to better serve our clients by using innovative products and services”

## Our Competences

- **Guidance for our clients**

“Willingness to help the clients understand, and to fulfill and address their needs with timely solutions at all times, even anticipating their needs by knowing the clients in advance.”

- **Orientation towards results**

“Focusing on personal and group activities in order to comply with the plans by acting with diligence and precision.”

## Introduction

Our team members constitute our most important asset.

In order to create a culture of respect, at Quality-1 Holdings we make great efforts to keep the internal communication channels open, so that team members can better understand our business and our mission and continue to move forward with a winning attitude, discipline and sense of urgency. We keep our commitment of complying with all the laws to provide a healthy, safe and mobbing-free workplace.

## Hiring and development

We try to attract and retain the best talents, as well as to help people reach their ultimate potential. We hire, compensate and promote according to qualifications, experience and training. We provide our team members with the necessary support and training so that they can achieve their specific goals. We review the performance of our team members periodically in order to make decisions about their retribution, promotion and continuity, thus guaranteeing compliance of expectation from both sides. Quality-1 Holdings also offers team members growth and development opportunities through continuous training. We encourage you to talk to your supervisor or director about your specific opportunities.

We promote a fair and competitive work environment. Quality-1 Holdings complies with salary and working hour regulations. Directors and supervisors should make sure that the members of their teams follow these regulations and should adjust the work load according to the individual capacity of team members. Quality-1 Holdings veils over the respect of human rights, dignity and privacy of the person. We abide by the current labor laws. Neither Quality-1 Holdings nor their business partners allow child labor, forced labor or human trafficking. Quality-1 Holdings respect the rights of team members of freedom of association, freedom of speech and freedom to be heard.

## Diversity in the workplace

Diversity is much more than a personal category. It is about accepting the ideas and thoughts of people. This is what will continue to drive our success in the future.

Quality-1 Holdings respects and values diversity among the members of their team. We strive to provide work opportunities to all team members without distinction of race, color, creed, religion, nationality, citizenship, sex, sexual identity, sexual orientation, marital status, pregnancy, age, health status, disability or military-veteran status.

## Section 1

### Commitment of our team members

## Behavior in the workplace and mobbing

Our team members are fundamental for success. Quality-1 Holdings values and appreciates personal diversity and the singular contribution of each team member. We will not tolerate any type of discrimination or mobbing, including any undesired or improper acts, or discriminatory behavior due to race, color, creed, religion, nationality, citizenship, sex, sexual identity, sexual orientation, marital status, pregnancy, age, health status or disability.

Harassment can be verbal, non verbal, physical or sexual. What a person might think inoffensive may be perceived by another as harassing, hostile, intimidating or humiliating. Remember: intentions and perception may vary. The important in harassment is not the intention but rather the perception of the person for whom such act is meant. Team members should act with respect, courtesy and consideration in their daily tasks and in their relationship to others. Team members should not participate in:

- The creation of racial, religious or any other kind of stereotypes.
- Pranks or scornful gestures.
- Physical or verbal conduct of a sexual, racist or defamatory nature.
- Intimidating or aggressive acts.
- Inadequate humor, or
- Dissemination or exhibition of offensive material at the workplace.

As team members, each one of us has a role to play in the creation of a positive work environment. Our directors and supervisors are vital for establishing an environment of appreciation, respect, justice and trust that contributes to the physical and emotional wellbeing of the members of our team. Directors and supervisors also set an example for team members through their verbal and non verbal behavior. Likewise, team members should always support and help each other and watch their own verbal and non verbal behavior. In case of work harassment or mobbing, team members should notify it as soon as possible to their directors, supervisor or Quality-1 Holdings management.

## Health, safety and environment

Quality-1 Holdings is committed to protect the health and safety of their clients, team members, the public and the environment.

Quality-1 Holdings is devoted to provide their team members a safe and healthy work environment. Team members share the responsibility of keeping their work place according to the Quality-1 Holdings health standards and practices. This includes reporting accidents, injuries and also unsafe equipment, practices or conditions.

Regardless of the situation, certain behaviors are unacceptable. No threats or violent behavior will be tolerated. The use, possession, production, sale or distribution of drugs in the company facilities or workplace is absolutely forbidden. Quality-1 Holdings expects their team members to show up for work in proper conditions to perform their tasks without any conduct alterations due to the effects of drugs or alcohol.

Quality-1 Holdings carries out activities in a sustainable way by minimizing any negative effect on the environment.

Team members are expected to do the right thing and follow the Company Code, policies and procedures when working on behalf of the company.

Team members directly contribute to the success and reputation of Quality-1 Holdings by applying their extraordinary training, sense of responsibility and better judgment. Quality-1 Holdings expects their team members to maintain their level of honesty by taking responsibility for their work, being accountable for such work and making proper use of company resources.

### Business Courtesies (for example, gifts and meals)

Business courtesies, such as gifts, entertainment, meals and trips are an established corporate practice and may be offered or accepted according to the policies and procedures of the company. Quality-1 Holdings acknowledges that decisions about products and services should be made for the benefit of the patients. We do not intend to promote our business through the offer or acceptance of business courtesies as improper incentives for the decision makers.

### Conflicts of interest

There will be conflicts of interest anytime the private interests of a person influence or interfere (or even appear to interfere) in any way with the interests of Quality-1 Holdings, the performance of the functions and obligations of team members or the fidelity to Quality-1 Holdings. The existence of a conflict of interests depends on the circumstances, including the nature and relative importance of the interests at hand. Conflicts of interest are strictly prohibited, except if these have been reported to and authorized by the respective Quality-1 Holdings department, after consulting with the Compliance Department and the Legal Department.

Team members who are not sure whether a specific act or situation may create a real or potential conflict of interest should contact the Quality-1 Holdings Compliance Department or Legal Department.

### Corporate Opportunities

Unless there is consent from the Quality-1 Holdings Administration Board, team members are forbidden to take advantage of any business opportunity that may arise from the use of any property, information or position of Quality-1 Holdings. Team members may not use any property, information or position of Quality-1 Holdings for their own benefit, nor can they compete with Quality-1 Holdings, either directly or indirectly. Team members are obligated to give preference to the Quality-1 Holdings corporate business interests whenever the occasion calls for it.

### Corporate Records

All books, records, accounts and financial statements of Quality-1 Holdings should be carried out with a reasonable level of detail, and should reflect adequately our operations, adjusting to legal requirements and to our internal control system. For instance, team members should:

- Make sure that manufacturing documents comply with the internal and external requirements and that they support Quality-1 Holdings product safety standards.



- Control that clinical data comply with the company's regulations and confidentiality levels.
- Accurately document and register business expenses.

Funds and assets in "double set of books" or not reflected in the books are strictly forbidden. Quality-1 Holdings demands an honest and accurate record and communication of information to help control our processes, detect and eliminate omissions and make responsible corporate decisions. Records should be kept or destroyed always according to the Quality-1 Holdings document keeping policies.

If you are not sure whether a specific expense is correct, ask your director or supervisor. There are also rules and instructions available at the Accounting Department.

### Use of Corporate Assets

Quality-1 Holdings is ethically responsible before their stockholders for operating in a profitable way. By the same token, team members are ethically responsible for protecting and ensuring the efficient use of the assets and property of Quality-1 Holdings.

In general, no company assets should be used, such as office supplies, production equipment, products and buildings, for private business or businesses unconnected to Quality-1 Holdings. Quality-1 Holdings allows for occasional and appropriate personal use of computers or telephones, provided such use does not:

- Affect work performance.
- Generate a significant cost for Quality-1 Holdings, or
- Harm Quality-1 Holdings in any other way.

Theft, negligence and waste directly affect our profitability, which in turn may affect the capacity of the company for reinvesting in the development of new products, providing training and improving the package of incentives and benefits of the team members.

Anytime you represent Quality-1 Holdings or travel due to company business, make sure you spend resources responsibly and moderately during your activities.

### Copyright Materials and computer software

Every now and then it will be necessary for team members to photocopy copyright works for business reasons. Team members should make sure that such copies comply with the current legislation about intellectual property.

Similarly, team members may reproduce and use any licensed software only according to the corresponding software license contract.

Team members should contact the Quality-1 Holdings Legal Department in case of any doubts concerning this matter.

We have worked hard and made great efforts in all we do to earn the trust of healthcare professionals (HCP), patients and government and industrial regulatory bodies.

We preserve this trust by being committed to the highest ethical standards, managing our business with integrity and complying with all the applicable legal and regulatory provisions. Compliance with the law, both in letter and in spirit, constitutes the foundation on which the ethical standards of Quality-1

Holdings lie. All team members should respect and comply with all the legal provisions, regulations and standards, as well as the policies and procedures of Quality-1 Holdings.

### Undue payments

Quality-1 Holdings is committed to comply with the current legislation concerning the fight against bribery and corruption in every country where it operates and carries out business. Team members should not offer, promise, authorize or pay any bribes or anything of value (directly or indirectly) to any person for the purpose of inadequately obtaining or compensating a deal favoring a commercial transaction. Quality-1 Holdings does not give, offer or accept undue payments under any circumstances, even if such act causes the loss or reduction of the business transaction.

### Competition, fair deal and anti-trust

Quality-1 Holdings intends to improve their competitive position in a fair and honest way. We make an effort to obtain competitive advantage with a better yield, but never by means of illegal or ethically reproachable practices. Obtaining via private information from another company or by theft the possession of industrial secret information without the consent of its owner, or inducing current or former employees of other companies to carry out such disclosure of information is forbidden. Quality-1 Holdings expects team members to engage in fair deals with clients, suppliers, competitors and other team members. We do not obtain illicit advantages from anybody through manipulation, concealment, abuse of privileged information, misrepresentation of essential facts or by means of any other fraudulent unfair competition practice.

Likewise, team members are forbidden to collaborate with a competitor or adopt any measures that can have an illicit effect of restriction of competition without the previous authorization of such act by the Quality-1 Holdings Legal Department.

## Section 2

### Acting with integrity

#### Interactions with healthcare professionals (HCP)

Quality-1 Holdings is committed to maintain ethical relationships with healthcare professionals (HCP). Maintaining solid work relationships with healthcare professionals (HCP) is essential for the success of Quality-1 Holdings and for the continuous improvement and innovation in patient care.

Quality-1 Holdings regularly collaborates with healthcare professionals (HCP) with consulting experience that provide services to Quality-1 Holdings in different fields and in the education and training for safe and effective use of our products. Many of such healthcare professionals (HCP) are also clients that recommend and use our products and services.

Our collaboration with the healthcare professionals (HCP) is closely regulated by the Administration authorities and subject to a special surveillance due to the different functions and financial relationships that the healthcare professionals (HCP) may have with Quality-1 Holdings. As such, we should strictly abide by the following regulations:

- Quality-1 Holdings does not use interactions with healthcare professionals (HCP) to improperly influence decisions about products, acquisitions or coverage.
- All decisions about products should be made for the benefit of the patient and not in exchange for any kind of payment or other benefit from the company.
- Quality-1 Holdings selects and hires healthcare professionals (HCP) for consulting services exclusively according to their qualifications, experience, competences and expertise, to cover a specific need and not according to some real or potential business of the company.
- Quality-1 Holdings remunerates healthcare professionals (HCP) for legitimate services provided, always according to the principles of fair market value.
- All agreements made with healthcare professionals (HCP) should be duly authorized and documented.
- Quality-1 Holdings never imposes or rewards a financial agreement with any healthcare professional (HCP). We do not give free products, services or donations to any healthcare professional (HCP) in exchange for an explicit or implicit agreement to use, acquire, request or recommend products or services of Quality-1 Holdings.

## Section 3

### Excellence in regulation and quality compliance

#### Our commitment to quality

Both the patient and the healthcare professionals (HCP) trust our commitment to the quality of our products, instruments and services. At Quality-1 Holdings we have adopted and applied systems and processes that comply with the regulations to guarantee the maximum quality and safety standards. All team members play an essential role in the continuous improvement of the Quality-1 Holdings quality assurance systems and processes.

We have the right team members to comply with the legal and regulatory provisions as well as with the applicable policies and procedures. Team members must also ask questions and express their concerns about the problems that may affect the quality or safety of our products, instruments and services.

#### International Commercial Restrictions

As a global company, Quality-1 Holdings sells and ships products internationally on a regular basis. We veil over the compliance with the applicable legal and regulatory provisions concerning import and export control in United States and in other countries where we carry out our business.

Quality-1 Holdings does not participate in commerce with penalized countries or forbidden boycotts.

#### Government Inspections and Investigations

Occasionally, certain government inspectors might contact us or request some information. Part of the Quality-1 Holdings policy is to provide full cooperation with government inspections and investigations. Team members should never destroy or modify Quality-1 Holdings documents, lie or make false statements to a government inspector, try to prevent another team member from providing accurate information, or obstruct, induce to error or delay communication of information or documents to any government authority. Team members should cooperate fully with Quality-1 Holdings regarding inspections and investigations.

If a government inspector contacts team members or requests any information from them, they should notify it immediately to their director, as well as to the Compliance Manager or Legal Counsel of Quality-1 Holdings. Team members should not give any document to any government inspector without the previous authorization of the Compliance Manager or Legal Counsel.

Quality-1 Holdings recognizes the importance of collaborating with the main stakeholders in the communities where it operates and conducts business.

Quality-1 Holdings complies with specific directives about advertising, marketing, public communication and implication in the policy process. In addition, safeguarding data from team members, clients and others is essential to maintain the trust of internal and external groups of interest of Quality-1 Holdings. As a good corporate citizen, we promote participation in charity, educational and humanitarian wherever we are present.

## Section 4

### Advertising and Marketing Practices

Advertising and marketing are important instruments that contribute to our success. Quality-1 Holdings complies with the local legal and regulatory provisions that rule advertising and marketing practices in each country. Quality-1 Holdings advertising and product marketing are subject to previous internal authorization processes, including the authorization of the Legal Department of Quality-1 Holdings.

The policy of Quality-1 Holdings is based on promoting and commercializing their products in a legal and true manner. Team members should provide an accurate statement about the possibilities and benefits of products and services. All promotional presentations, including affirmations and comparisons of the products, should be accurate, balanced, fair, objective, and free of ambiguities and in accordance with their labels.

By the same token, comparisons of Quality-1 Holdings products with the products of a competitor should be fair, well-founded, and should comply with all the legal and regulatory provisions. Quality-1 Holdings products should not be labeled or marketed in a way that such products could be mistaken for the products of the competitor. We should not underestimate the products, services or employees of our competitors.

We market our products only for the use they have been authorized for, as established by the regulatory and government agencies.

Generally, Quality-1 Holdings does not participate in activities to promote or market healthcare professionals (HCP) or their institutions. All activities related to healthcare professionals (HCP) should comply with the applicable legal and regional practices and meet the requirements of fair market value.

### External Communications and Commitment

#### Quality-1 Holdings Confidential or Protected Information

Team members should not disclose or allow disclosing any confidential or proprietary information of the company to persons who are not part of the team, except if such information is authorized by the Quality-1 Holdings Legal Department or is legally mandatory according to the applicable legal or regulatory provisions.

Should the confidential or proprietary information of the company fall in other hands, either by accident or deliberately, Quality-1 Holdings or its clients may be harmed. The obligation of the team members is to preserve the confidentiality of the Quality-1 Holdings private information; such obligation shall remain even after their working relationship is over.

All team members are entitled to the confidentiality of certain work documentation and their personal data, such as name, address, date of birth, official identification number, remuneration, work status and performance, pursuant to local legislation. Quality-1 Holdings saves and keeps such personal information pursuant the applicable legal and regulatory provisions. We limit access to such information

as pertinent and we use it only as needed for legitimate company purposes, such as human resources management.

Any use of the brands and brand names of Quality-1 Holdings should adjust to our policies and procedures. Quality-1 Holdings respects intellectual property and will never knowingly infringe any patents, brand names and current copyrights of third parties. In case any team members come to believe that another company is violating a patent, trademark or copyrights of Quality-1 Holdings, they should contact the Quality-1 Holdings Legal Department.

#### Charitable, educational or humanitarian resources

Quality-1 Holdings veils over the communities where it operates and develops its activities through promoting participation in charity organizations and charitable, educational and humanitarian actions and their financing. Such resources should never depend on the recommendation, use or purchase of our products or be related to such products in any way.

#### Political process and contributions

Public servants often need timely and valid information on which to base their decisions. Occasionally, through appointed speakers, Quality-1 Holdings will offer opinions about any legislation that may affect the business interests of Quality-1 Holdings, team members or clients. We comply with all the applicable legal and regulatory provisions concerning the fight against political pressure for obtaining benefits or attempting to influence public servants. Furthermore, Quality-1 Holdings makes no corporate political contributions.

The Code summarizes the basic principles and ethical standards that are applicable to all team members.

It is expected that you behave according to the ethical and legal standards described in the Code and in the policies and procedures of Quality-1 Holdings. Team members should try to avoid even the perception of any improper behavior. Quality-1 Holdings expects all team member to read, understand and follow the Code. It is expected that team members, in addition to completing training requirements, subscribe from time to time a written recognition as to having read and understood the Code and accept compliance therewith.

#### Notice of violation or suspected violation

Team members are obligated to report any suspicion or knowledge of concerns or violations either in person to their director or supervisor, or to the Quality-1 Holdings Compliance Department or calling the company's compliance assistance lines.

Suspected or known activities that need to be reported are the following:

- Violations of applicable legal, regulatory or sector code provisions.
- Violations of the present Code.
- Violations of our policies and procedures, and also

- Concerns about accounting, internal accounting control or matters related to Quality-1 Holdings auditing.

Such violations should be immediately reported for the common good, since in doing so you may contribute to prevent Quality-1 Holdings from illegal or immoral actions and prevent the situation from getting worse.

Any reports will be confidential and will be investigated. Team members may chose to make an anonymous report unless the law requires otherwise. Although we strive to maintain the confidentiality of the complainant, there might be a decree or court order that requires that Quality-1 Holdings reveal the identity of such person.

Failure to report violations or suspected violations might have important consequences. According to the seriousness of the violation and the applicable legislation, team members that violate the Code, fail to provide information concerning a legal controversy or real or suspected noncompliance, or that do not cooperate in any other way in an investigation, will be subject to the pertinent disciplinary measures, which may include the rescission of the employment or service contract. Furthermore, team members that violate laws and decrees of the Administration might expose Quality-1 Holdings and themselves to significant fines, penalties and damage compensation.

## Section 5

### Use of the Code

#### Policy of no reprisal

Quality-1 Holdings forbids taking reprisals against any team members that report in good faith a violation or suspected violation or legal controversy. “Good Faith” does not mean that the team member is right, but rather that the team member believes that the information submitted is true. If a team member believes that he/she is being the object of reprisal, the situation can be reported to the Quality-1 Holdings Compliance Department or Legal Department.

Team members can submit their doubts or concerns to Quality-1 Holdings through any of the available channels.

Team members must never hesitate to use any of the Quality-1 Holdings available channels. Even the simple interrogation of a person reporting a violation can lead to involuntary repercussions, since it can make a person feel bad about choosing one method over another.

Any persons denouncing a violation of compliance of the Code may choose any method they consider most suitable for communicating their concerns to a Quality-1 Holdings.

Any team member taking reprisal against another team member will be violating the Code and will be subject to disciplinary measures that may even include dismissal. Taking reprisal may also constitute a violation of the law and might give rise to legal responsibilities both for the infractors themselves and for Quality-1 Holdings

## Conflicts

The Code offers guidance about the applicable legal and regulatory provisions concerning Quality-1 Holdings activities; however, such legal and regulatory provisions are usually complex and vary from one country to another. In case of conflicts between the Code and a law or regulation, the most restrictive provision will prevail. Team members that believe there is a conflict between the Code and a law or regulation, or that are not sure about how to proceed, should contact the Quality-1 Holdings Compliance Department or Legal Department.

## Exemptions and modifications

Occasionally, under specific circumstances, the exemption of a provision of the Code might be adequate. Any team members needing an exemption should speak to their director or supervisor who would in turn contact the Quality-1 Holdings Compliance Department

Only the Quality-1 Holdings Administration Board is authorized to apply an exemption of the Code to executives or consultants, which should be notified immediately according to the applicable requirements. Any exemption or modification of a provision of the Code that is applicable to the high executives will be notified according to the applicable requirements.

Quality-1 Holdings reserves the right to review the Code periodically to establish whether the reviews are appropriate and carry out the necessary corrections.