



Pay Transparency Policy

Midera is committed to fair, equitable, and transparent compensation practices. This Pay Transparency Policy establishes Midera's approach to communicating compensation information, promoting pay equity, and complying with applicable pay transparency laws in the jurisdictions where we operate.

Scope

This policy applies to all employees, applicants, managers, and Human Resources personnel of Midera and its subsidiaries worldwide.

Where local laws provide greater employee rights or impose additional requirements, those laws will take precedence over this policy.

Policy Statement

Midera believes compensation decisions should be based on objective, job-related factors, including:

- Job responsibilities and scope
- Skills, qualifications, and experience
- Individual performance and demonstrated results
- Market competitiveness
- Geographic location
- Internal pay equity
- Business needs

Midera is committed to maintaining compensation practices that are fair, consistent, nondiscriminatory, and aligned with its overall compensation philosophy.

Pay Transparency Principles

Compensation Ranges

Where required by applicable law, Midera will provide compensation ranges to applicants and employees for applicable positions.

Compensation ranges may include:

- Base salary or hourly wage range
- Bonus or incentive opportunities, if applicable
- Long-term incentive opportunities, if applicable
- Other forms of compensation required to be disclosed under applicable law

Job Postings

Where required by applicable law, Midera will include compensation-related information in job postings, which may include:

- The expected compensation range for the position
- Information regarding applicable benefits
- Bonus, commission, or incentive opportunities, where applicable
- Other compensation-related disclosures required by local law

Pay Equity

Midera is committed to maintaining equitable compensation practices and may periodically review compensation data to identify and address unexplained pay disparities.

Compensation decisions will not be based on any protected characteristic, including:

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| • Race | • National origin |
| • Color | • Age |
| • Religion | • Disability |
| • Sex | • Veteran status |
| • Sexual orientation | • Any other characteristic protected |
| • Gender identity or expression | by applicable law |

Employee Rights and Non-Retaliation

Consistent with applicable law, employees have the right to inquire about, discuss, or disclose their own compensation. Midera prohibits retaliation against any employee or applicant for:

- Requesting compensation information as permitted by law
- Discussing their own compensation
- Exercising rights under applicable pay transparency laws
- Raising concerns regarding pay equity or compensation practices

Compliance

Midera will comply with all applicable pay transparency, pay equity, and compensation disclosure requirements in the jurisdictions where it operates. Human Resources is responsible for monitoring legal developments and supporting compliance with this policy