

medac Group  
Code of Conduct  
Our Core Values and Beliefs

Dear colleagues,

As a responsible and forward-looking pharmaceutical and medical devices company, we have set out the core values of our commercial activities and dealings in our Code of Conduct. medac places people at the heart of its actions. We take responsibility for our actions and focus all of our expertise on delivering high-quality and safe products to patients, doctors, medical staff, laboratories and hospitals. Our business relationships are founded on Hanseatic reliability. While our core values are the foundations for the trust that doctors, patients and business partners place in us, our good reputation and the commercial success that we achieved together over the past decades also stem from our sense of responsibility and integrity.

It is incumbent on all of us to adhere to the principles of our Code of Conduct throughout our daily work. Our Code of Conduct helps us to make appropriate and correct decisions in our day-to-day activities, particularly in difficult situations.

All employees of the medac Group are required to read our Code of Conduct carefully, internalise and apply it in their daily work. Only by doing this can we ensure the future success of our company together.

As members of the Executive Committee, we regard it as our top priority to reflect the principles of our Code of Conduct every day through our own actions that are based on responsibility and integrity.



Frank Lucaßen  
CEO



Frank Generotzky  
COO



Heiner Will  
CBDO

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Our Code of Conduct is mandatory for all of us.

- It applies
- **equally to members of the Executive Committee and employees**
  - **to all employees of medac GmbH worldwide including all national and international offices and subsidiaries**

We are all personally responsible for meeting the high ethical standards that are set out in our Code of Conduct. Naturally, our Code of Conduct cannot cover every feasible day-to-day situation. For more guidance, see our set of guidelines at medac intranet

in which various compliance issues are addressed again in detail. If neither the Code of Conduct nor the guidelines can provide a suitable answer, please contact Compliance directly.

- It applies
- **Our business activities must always be in harmony with our Code of Conduct, our guidelines and applicable law.**

We do not tolerate any infringements of the principles of our Code of Conduct. Even apparently minor infringements can lead to serious consequences for our company, the employees involved and the executive committee (including severe fines, compensation, loss of public contracts, damage to reputation). Any violations of our Code of Conduct by employees are thoroughly investigated and, depending on the severity, may lead to measures being taken under employment law.

If you have any questions about the rules of our Code of Conduct, please contact Compliance at any time.

For information about using our reporting system, see page 32 of the Code of Conduct and the following link:

<https://www.bkms-system.com/medac>

1.

The wellbeing of the patient is  
at the heart of our work



The wellbeing and safety of the patient are the top priority.

Our products are used for the reliable diagnosis and effective treatment of illnesses. We focus our business activities on this objective, from development through to the marketing of our products.

### 1.1 QUALITY IN RESEARCH, DEVELOPMENT AND PRODUCTION

We stand for high-quality products. All of our scientific and clinical research work is performed to the highest medical and scientific standards. We therefore observe all applicable laws and regulations during our research and in the development of our products, in particular Good Laboratory Practices (GLP) and Good Clinical Practices (GCP).

We ensure that the integrity and quality of the study data that we collect during development and research is always safeguarded by us.

We strictly adhere to all applicable regulations during the production of our products, in particular the Good Manufacturing Practices (GMP) and our internal quality standards. We also ensure that our suppliers observe the relevant standards. Any medac employee who notices that the quality standards are not being upheld, is required to report this to the employee responsible for the relevant SOP.

### 1.2 PATIENT SAFETY

We continuously monitor, review and evaluate all information on the safety of our products and are committed to taking all measures necessary to ensure patient safety.

Any medac employee who learns of complaints or quality problems of a medac product - be it professional or private - must report this immediately to complaint management.

### 1.3 COLLABORATION WITH PATIENTS AND PATIENT ORGANISATIONS

Collaborations with patients and patient organisations can provide important exchanges of information. However, such collaboration is a sensitive areas, as we are required to comply with particularly high ethical standards and maintain all applicable laws, guidelines and industry codes. Such collaboration must not result in, or give the impression of, undue influence being exerted on patients or patient organisations or that medac does not respect the neutrality or independence of the patient organisations.

Collaboration with patients and patient organisations, as well as support for patient organisations, may only proceed in accordance with the detailed specifications of the medac guideline Collaboration with Patient Organisations.

## 1.4 SUMMARY

### **WE**

- conduct research and development work in accordance with the highest medical and scientific standards and immediately report side effects, complaints or quality issues relating to products to the responsible department.
- observe the independence of patient organisations and do not exert any undue influence on their activities.

# 2.

## Collaboration with healthcare professionals



We respect the independence of doctors, pharmacists and other healthcare professionals and their freedom to choose treatment plans.

As a pharmaceutical and medical devices company, we work with doctors, pharmacists and other healthcare professionals.

Our collaboration with such persons and their institutions must never compromise or unfairly influence their medical independence or their therapy, prescription or procurement decisions. Even the mere suggestion of such compromise or unfair influence must never be given.

We will not accept or tolerate any collaboration with healthcare professionals that violates our rules. This would not only harm the reputation of our company, but may also violate anti-corruption law (§§ 299b, 331 ff. of the German Criminal Code) as well as the Drug Advertising Law and the law against unfair competition. It could also contravene the principles of the code of conduct of AKG e.V. [Pharmaceuticals and Cooperation in Healthcare], the BVMed [German Medical Technology Association] code of conduct on medical devices, and the VDPGH e.V. [Diagnostics Industry Association] code of conduct governing in-vitro diagnostics and medical devices by which we are bound. There may be financial losses for the company and consequences for the employees involved under criminal and employment law.

## 2.1 CONSULTING SERVICES

We engage the services of healthcare professionals only in order to pursue a permitted, materially justified business objective. Such services may take the form of consulting services, advisory boards or speaker activities, for example. We document all collaboration work.

Remuneration must be at the market rate and appropriate to the service provided. Such collaboration must also comply with the applicable laws (particularly criminal law and the law on drug advertising) and the codes of conduct of the AKG, BVMed and VDPGH.

In particular, it is vital that our collaboration does not unfairly influence therapy, prescription or procurement decisions or give the impression such influence has been exerted.

## 2.2 SUPPORT FOR RESEARCH PROJECTS

When supporting third party research projects or studies, we ensure the independence and scientific integrity of the research is maintained. If the third-party research pertains to our own products, then our support must influence neither the design nor the outcomes of the research.

We support non interventional trials (observational studies) only if the trial has a robust scientific objective and satisfies all requirements of the applicable laws and industry codes.

## 2.3 GRANTS, SPONSORSHIP AND DONATIONS

Grants, gifts and invitations issued to healthcare professionals are a sensitive area. We never issue grants, gifts or invitations in order to influence therapy, prescription or procurement decisions. Without exception, we only issue gifts and grants if this is expressly permitted in the guideline “Collaboration with Healthcare Professionals”. This even applies to very minor grants or gifts. We document all grants and gifts in accordance with our internal guidelines.

We endorse further training for professionals in order to promote effective and safe use of our products. We only support those training events that have an emphasis on profession-related science. Our guideline “Collaboration with Healthcare Professionals” provides details outlining the extent to which we support the participation of healthcare professionals in training events.

We also make donations to institutions or organisations in healthcare (e.g., hospitals, professional bodies) only if these cannot give the impression that such donations could influence therapy, prescription or procurement decisions or recommendations made by the institution or organisation.

## 2.4 MARKETING

Our informational and promotional activities aim to inform healthcare professionals about the properties and therapeutic value of our products and how they are used. As such, we market our products in accordance with all applicable laws and industry codes. We take particular care to ensure our statements about our products are correct, balanced and are not misleading. We only use documents and materials that have been internally approved within the company.

We only issue promotional products and samples to industry professionals to the extent that this complies with applicable laws and industry codes

## 2.5 SUMMARY

- WE**
- only collaborate with healthcare professionals to achieve legitimate business objectives and not to influence prescription or procurement decisions.
  - observe the applicable laws and industry codes as well as the requirements of our own internal guidelines in any collaboration with industry professionals.
  - consult with the Compliance department in cases of doubt.

# 3.

## Collaboration with business partners



Integrity is at the heart of our work, helping to build the long-term trust of our business partners.

Corruption will not be tolerated!

We want to achieve our business goals solely through legally and ethically sound methods. We are therefore committed to combatting corruption in all its forms. At all times, we observe the regulations of the criminal code governing anti corruption (§§ 299, 299a, 299b, 331 ff. of the German Criminal Code).

Corruption does not just jeopardise the good reputation of our company, but can also lead to significant financial penalties for our business. The employees involved may face consequences under criminal, civil and employment law. We must therefore avoid any possible appearance of corruption.

For more information on anti-corruption, please see our anti corruption guideline at medac intranet.

### 3.1 RECEIVING AND GIVING DONATIONS

Receiving and giving gifts or invitations is a sensitive area. It is important to avoid even the suggestion that gifts could be used or intended to influence business decisions of the medac Group or our business partners. All of the donations we make are always permitted and transparent.

In any cases of doubt or whenever the situation requires approval, always contact Compliance before making or accepting any donation.

### 3.2 WE DO NOT BRIBE

Our actions must never give the appearance that we wish to unlawfully influence the business decisions of our business partners. As such, we do not promise or give our business partners any gifts to induce them into offering us or the medac Group a commercial advantage (for example in the form of a contract or favourable business terms). We never promise or offer business partners cash payments!

### 3.3 WE DO NOT ACCEPT BRIBES

We do not demand donations from third parties and do not accept any that may be used or intended to influence our business decisions.

### 3.4 EXAMPLES OF REGULAR PERMITTED GIFTS

Generally standard, low value promotional gifts (e.g., biro or calendar with company logo) with a market value of less than EUR 5.

Invitations to business meals that are held within an appropriate framework.

### 3.5 EXAMPLES OF REGULAR INADMISSIBLE GIFTS

- Cash, valuable personal gifts such as a luxury watch.
- Personal favours, for example granting an interest free loan or free home improvements.
- Invitations to a private holiday.
- Payment of travel costs for family members or friends to accompany professionals to training events

### 3.6 DONATIONS

Donations are voluntary and free grants to third parties for example in the form of money or material goods.

When we make donations, we do not expect any service in return.

We do not donate to political parties or persons or organisations affiliated with them.

Donations that are made to organisations in healthcare must be approved by Compliance, while donations made to organisations outside healthcare must be approved by the executive board

### 3.7 SUMMERY

**WE**

- do not promise or give our business partners or other third parties any gifts to induce them into offering us or the medac Group a commercial advantage (for example in the form of a contract or favourable business terms).
- do not demand or accept donations from third parties that may be used to influence our business decisions.
- do not make any donations to political parties or persons or organisations affiliated with them.
- consult with the Compliance department in cases of doubt.

# 4.

## We avoid conflicts of interest



Our decisions are always based on objective criteria. We always separate our business interests from our private interests.

It is important to us that our employees do not become engaged in any conflicts of interest. Conflicts of interest run the risk of commercial decisions being influenced by personal motives and thus no longer being made in the best interests of the company. In addition to the company's business interests, conflicts of interest can also harm our good reputation.

#### 4.1 WHAT IS A CONFLICT OF INTEREST?

A conflict of interest could occur when an employee's personal or financial interests are contrary to the interests of the medac Group. This can always be the case if personal, professional or commercial relationships exist between our employees and business partners of the medac Group.

#### 4.2 ANY CLOSE PERSONAL RELATIONSHIPS IN A BUSINESS CONTEXT MUST BE REPORTED

Our employees must make their business decisions based solely on objective criteria and must not be guided by personal relationships. Our business partners must be selected based solely on objective criteria such as quality, price and reliability.

Even the appearance of any conflict of interest must be avoided. Therefore any employees who have a close personal relationship with a business partner of the medac Group (e.g., a family relation) are not allowed to make any business decisions that involve that business partner (such as awarding contracts) without first notifying Compliance of these circumstances.

#### 4.3 SIDELINE ACTIVITIES AND HOLDINGS MUST BE REPORTED

Sideline activities or holdings in companies with which we have a business relationship or with which we are in competition could lead to a conflict of interests. Assuming a sideline activity at a business partner or a competitor and any holdings in such companies must therefore be reported to Compliance.

#### 4.4 EXAMPLES OF SITUATIONS IN WHICH A CONFLICT OF INTEREST MAY ARISE

- A family member of an employee holds an important position at a hospital with which we have or intend to enter into a business relationship.
- An employee has a holding in a supplier of the medac Group.
- An employee intends to take up a consultant position as a sideline at a company that is one of our competitors.

A conflict of interest could occur in all of these cases. As such, we expect you to inform us openly of such or similar situations.

## 4.5 SUMMARY

- WE**
- always base our decisions on objective criteria. Always separate the business interests of the medac Group from our private and own financial interests.
  - immediately inform our Chief Compliance Officer of any possible conflicts of interest.

# 5.

## Fairness in competition



We are committed to the principles of fair competition.  
We do not enter into agreements that seek to limit competition.  
We do not abuse any market power.

We are committed to free and impartial competition. We draw solely on our own strengths in competition with other companies and rely on our high quality and innovative products to convince our customers.

We comply with competition and monopoly laws. Infringements of these laws may lead to serious consequences for our company and the employees involved. In addition to severe fines for the company and the employees involved, the company may also face compensation claims from customers or competitors, exclusion from public contracts and negative press.

## 5.1 WHAT DO MONOPOLY LAWS PROHIBIT?

Monopoly laws serve to protect free and fair competition. As such, agreements are banned between market players seeking to restrict competition, for example by

- fixing prices or price components.
- dividing markets, customers or regions.
- boycotting specific competitors.

Also banned are any informal verbal agreements on competition parameters (“gentlemen’s agreements”). The sharing of market sensitive information is also banned between market players, i.e., such information that may offer indications on present or future market behaviour (prices, costs, customers, sales volumes, production capacities, and so on).

## 5.2 CORRECT DEALINGS WITH OUR COMPETITORS

We do not participate in agreements with our competitors that are harmful to competition. If a competitor wishes to enter into an agreement with us (e.g., as part of a tender) or unilaterally share market sensitive information with us, we must immediately and expressly distance ourselves from such actions. We then immediately inform Compliance of the incident.

## 5.3 CORRECT DEALINGS WITH OUR SUPPLIERS AND CUSTOMERS

We are also bound by monopoly laws when it comes to our suppliers and customers. Agreements with suppliers or customers could prove problematic, if, for example, they require:

- the business partner solely to deliver to us or buy from us.
- customers to report their monthly sales and turnover figures to the medac Group.
- customers to demand specific fixed or minimum prices from their customers.

The Legal department must therefore always be consulted before concluding any such contractual arrangements.

## 5.4 WE DO NOT ABUSE ANY MARKET POWER

Monopoly laws prohibit the misuse of a dominant market position. Such behaviour may exist in the following circumstances for example:

- Competitors are forced out of the market through a targeted price cut strategy.
- The purchase of a dominant product is tied to the purchase of a product with less market significance.

For more information on monopoly law, see our "Guideline on Avoiding Monopoly Law Risks" at medac intranet.

## 5.5 SUMMARY

**WE**

- always observe the applicable monopoly laws.
- do not participate in agreements with our competitors that are harmful to competition.
- never exchange market sensitive information with our competitors.
- never misuse any dominating position in the market that we might hold.
- have contracts with business partners that do not reflect existing contract templates checked by the Legal department prior to conclusion.
- consult Compliance if we are unsure whether an action may contravene monopoly laws.

6.

## Combatting money laundering and financing of terrorism



We fight all forms of money laundering and terrorist financing.

We check the identity of our business partners prior to entering into business relationships!

Money laundering and terrorist financing place significant challenges on lawfully operating businesses. We must meet these challenges to ensure that we always operate within legal frameworks. We therefore take all necessary measures to avoid even the appearance of engaging in money laundering activities or financing of terrorism.

## 6.1 WHAT CIRCUMSTANCES CONSTITUTE MONEY LAUNDERING OR TERRORIST FINANCING?

Money laundering refers to unlawfully acquired money or assets being injected into the legal financial and economic system. Terrorist financing refers to money or other funds being made available to terrorist organisations.

Companies can face significant financial penalties and loss of reputation if they become involved in money laundering or terrorist financing. Employees may face consequences under criminal and employment law.

## 6.2 6.2 WHEN IS SPECIAL CAUTION ADVISED ("RED FLAGS")?

- When it is difficult to establish the identity of a contractual partner / customer or the beneficial owner.
- If a business partner uses external third party companies based in non EEA countries to process payments.
- If the business partner pays or wants to pay in cash.

If you come across red flags or similar situations or if you are unsure, inform Compliance immediately. Place the transaction on hold until it has been approved by Chief Compliance Officer.

For more information on handling suspect cases of money laundering and terrorist financing, see our "Guideline on Preventing Money Laundering".

For further information about checking business partners, see our "Guideline on Contractual Partners - Checking Business Partners":

## 6.3 SUMMERY

- WE**
- verify the identity of our contractual partners before entering into a business relationship.
  - contact Compliance immediately if we are suspicious or in any doubt.

# 7.

## Export control and sanctions regulations



We observe the national and international export control and sanctions regulations in our business relationships as well as any other restrictions required under foreign trade law.

## 7.1 WHAT DO EXPORT CONTROL AND FOREIGN TRADE LAW MEAN?

The medications, diagnostic equipment and other preparations developed by us are exported to numerous countries. Likewise, in order to manufacture these products, we are dependent on other goods that we import from other countries. In both cases, export control regulations and foreign trade law may apply. These set out various obligations that we are required to observe. For example, there may be a ban or restrictions on the import or export of certain products (product specific bans or restrictions). It may also be the case that we are not allowed to do business with companies from specific third countries (country specific bans). The same may apply to individual persons who are listed in sanctions lists.

Violating these bans may lead to high financial penalties against our company. The persons involved may have to face financial or criminal consequences. Before conducting such imports or exports, we must always ensure that a transaction is permitted under export control regulations and foreign trade law. We must also ensure that we are allowed to trade with the respective company or person in the first place.

## 7.2 EXAMPLES OF PROBLEMATIC CASES UNDER EXPORT CONTROL REGULATIONS

- A potential business partner is headquartered in Belarus, North Korea or Iran.
- A potential business partner is listed in a sanctions list of the EU.

For more information about checking business partners, see our "Guideline on Checking Business Partners" at medac intranet.

## 7.3 SUMMARY

- WE**
- always check the sanctions list before entering into a business relationship.
  - always perform export control on relevant product exports.
  - contact Compliance if there is any doubt or we have questions.

# 8.

## Data protection



We handle the data entrusted to us responsibly.  
We process personal data only on the basis of appropriate authorisation.

## 8.1 WHY IS DATA PROTECTION NECESSARY?

Each day, we handle a large amount of data from our business partners and customers as well as our employees. We also come into contact with the health data of patients. Various data protection regulations exist to safeguard this data. This especially applies to patient data.

Violations of these regulations are not treated as trivial offences by the responsible authorities and courts but may instead lead to substantial fines. There is also the possibility of a negative impact on the company's image and compensation claims, particularly in the event of data protection breaches. We therefore always observe the applicable data protection regulations and handle the data entrusted to us responsibly.

## 8.2 WHAT IS PERSONAL DATA?

Personal data is any data that can be used, directly or indirectly, to identify a person, e.g., name, date of birth, place of birth, health data, sick days, bank details, and so on. Even pseudonymised data is often deemed to be personal data and subject to data protection regulations.

## 8.3 EXAMPLES OF INFRINGEMENTS AGAINST DATA PROTECTION REGULATIONS

- An employee sends a doctor who has previously provided consulting services to medac marketing material without his or her consent.
- An employee uses pseudonymised patient data from a clinical trial for other purposes even though the consent of the patient under data protection law applies only to the clinical trial.
- An employee in the Procurement department forgets to delete the personal data of a supplier even though the business relationship with the supplier has permanently ended.

## 8.4 SUMMARY

- WE**
- handle the data entrusted to us responsibly.
  - process personal data only on the basis of the consent of the person concerned or appropriate legal authorisation.
  - contact Compliance in the event of questions or doubt.

# Protection of trade secrets



Our know-how is the foundation of our business and must be protected without exception.

The medac Group possesses valuable know how in the areas of oncology, urology and autoimmune disorders, which forms the foundation of our success and sets us apart from our competitors. Any unauthorised sharing or publication of our know how or any other trade secrets could cause huge damage to us. We therefore take all necessary measures to protect our trade secrets. Employees who harm our trade secrets will face consequences under employment and civil law and, in the event of wilful disclosure, may be subject to criminal proceedings.

## 9.1 WHAT ARE TRADE SECRETS?

Our trade secrets include such information as preclinical and clinical study data, chemical formulas, compositions of substances, production methods, procurement sources, customer lists, sales figures, and balance sheets. Unauthorised disclosure of this company information is not permitted under any circumstances.

## 9.2 EXAMPLES OF VIOLATIONS OF TRADE SECRETS

- An employee works on an internal presentation about a new development during a long train journey. Without his or her knowing, a passenger reads the presentation over his or her shoulder.
- An employee wants to continue working at home after business hours and copies a business development plan to an unencrypted USB stick. On the way home, the USB stick gets lost.
- An employee starts a new job with a competitor and takes documents that contain medac Group trade secrets, which he or she gives to the new employer.

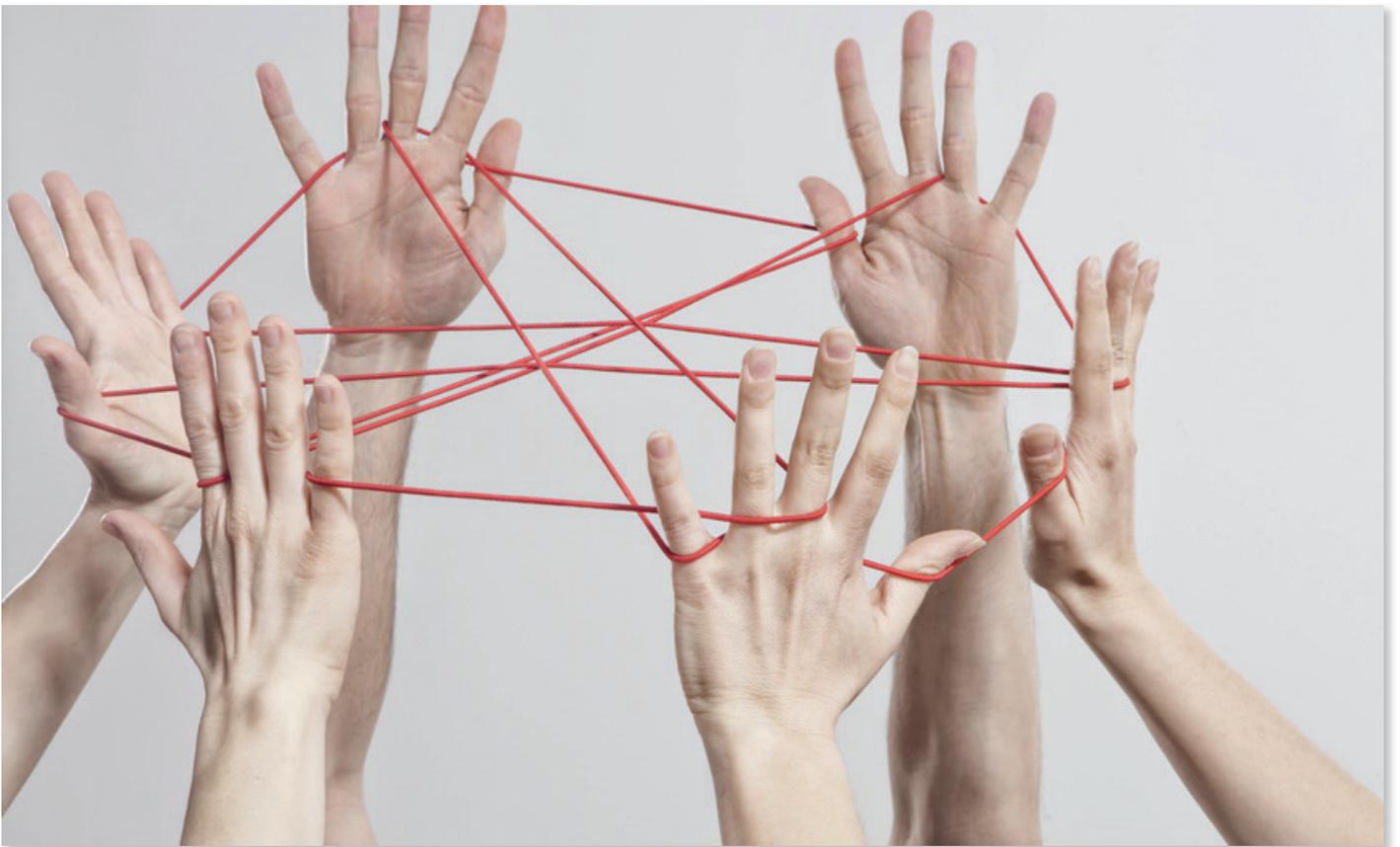
## 9.3 SUMMARY

**WE**

- never disclose our trade secrets to third parties without authorisation or involuntarily.
- take all necessary measures to protect our trade secrets.
- immediately report any unauthorised or involuntary disclosure of trade secrets to Compliance.

# 10.

## RESPECTFUL APPROACH



For us, respect means promoting diversity and protecting our employees from discrimination and harassment.

We are also respectful of our environment and handle natural resources sparingly.

We are committed to ensuring an atmosphere of respect among our employees and towards our business partners and customers.

### 10.1 DIVERSITY AND HUMAN RIGHTS

We promote diversity as a key component of our corporate culture and are committed to internationally recognised human rights. Our business, professional (and personal) decisions are taken without regard for skin colour, gender, language, religion, political or other persuasions, ethnic or social background, birth or any other status. We fully reject forced labour, child labour and any other form of modern slavery.

### 10.2 NO DISCRIMINATION OR HARASSMENT

We do not tolerate any discrimination, harassment of any sort or any type of behaviour that insults, humiliates or otherwise devalues our employees. Any such behaviour is consistently punished and may lead to measures being taken under employment law. This also applies to postings on social media.

### 10.3 ENVIRONMENTAL PROTECTION

For us, consideration does not only mean that we treat each other with respect. We also treat our environment and the natural resources of our planet responsibly and carefully. We consistently implement regional, and international standards and minimize risks for people and the environment by complying with the relevant laws, ordinances, regulations and internal quality management systems and reviewing them on a regular basis. To achieve a continuous improvement of our environmental performance, activities that may have a negative impact on the environment are measured and evaluated within the framework of our certified environmental management system (according to DIN EN ISO 14001).

### 10.4 EXAMPLES OF IMPROPER CONDUCT

- An employee is bullied by two other employees based on his or her skin colour/religion/sexual orientation.
- An employee makes a joke with sexual connotations to another employee during lunch.

### 10.5 SUMMARY

- WE**
- treat each other and our business partners with respect.
  - do not tolerate any discrimination or harassment of any kind.
  - are responsible and sparing when it comes to our environment.

# 11.

## Occupational health and safety



We do not compromise when it comes to the health and safety of our employees at work.

All of our employees actively contribute to a safe and healthy working environment through their behaviour.

Ensuring safe and healthy working conditions for our employees is one of our top priorities. We therefore abide by the applicable occupational health and safety provisions. By employing targeted measures to promote health and safety, we are committed to reducing the risk of occupational accidents and sickness. We have established a company integration management system to help ensure the long-term health of our employees, prevent work incapacity and offer preventative aids.

We also continually strive to make our work methods and processes even safer. Measures include conducting risk assessments pursuant to § 10 MuSchG [German Maternity Protection Act] to protect mothers at work and in training [SOP G 17.01.-7.2.].

### 11.1 OCCUPATIONAL HEALTH AND SAFETY AS A JOINT RESPONSIBILITY

In addition to the measures and precautions adopted by us to ensure occupational health and safety, every employee is responsible for promoting a safe and healthy working environment. This includes refraining from particularly hazardous and accident prone behaviour. As such, it is forbidden to consume alcohol or drugs during working hours, during breaks and when on company premises. For more information, see the Works Agreement "Addiction":

Employees are also responsible for proactively drawing attention to possible injury or accident risks (e.g., a defective machine).

### 11.2 EXAMPLES OF IMPROPER CONDUCT

- An employee notices that individual roof tiles on a warehouse are loose. He/she finishes work without informing his or her superior.
- Several employees celebrate a colleague's birthday with alcohol during a lunch break.

### 11.3 SUMMARY

- WE**
- abide by the applicable occupational health and safety provisions.
  - do not consume any alcohol or drugs during working hours, during breaks and when on company premises.
  - actively help to reduce the risk of occupational accidents and sickness. Immediately notify Compliance of possible hazards and particular risks.

# 12.

## Reporting system



We encourage our employees to report any potential law breaking or violations of our Code of Conduct. Employees who make a report in good faith do not have to worry about any negative consequences! This applies even if the report turns out to be unwarranted.

## 12.1 PURPOSE OF THE REPORTING SYSTEM AND HOW IT WORKS

To prevent harm to our company, we rely on the support of every employee. Each and every employee is therefore responsible for uncovering and preventing any potential violations of the law or our Code of Conduct. We expect our employees to report any potential violation of the law, violation of the principles of our Code of Conduct or violation of our guidelines. This includes submitting reports on possible infringements in the following areas:

- violations of quality and reporting requirements with respect to our products,
- violations of our principles governing work with patients and patient organisations,
- violations of our principles governing work with healthcare professionals,
- corruption,
- competition violations,
- money laundering and financing of terrorism,
- violation of occupational health and safety provisions,
- violations of trade secrets,
- discrimination / harassment.

If you do not wish to report a potential violation to your line manager or Compliance directly, you can also submit a report anonymously via our external reporting system. The reporting process is designed so that your identity remains strictly confidential if requested. You can access the reporting system at

<https://www.bkms-system.com/medac>

## 12.2 PROTECTING WHISTLEBLOWERS FROM REPRISALS

We would like to emphasise very clearly that whistleblowers will in no way be regarded as "traitors". On the contrary: whistleblowers help us to ensure we are acting within the law and prevent damage to our company. The earlier any potential violation of laws or our Code of Conduct is reported, the better chance we have of limiting the potential damage to our company. We therefore protect all employees who in good faith report potential misconduct. This applies even if the report turns out to be unwarranted.

We will not protect those who, against their better knowledge, submit a false report of a violation in order to cause harm to another employee.

For more information about our reporting system, see our whistleblower guideline at medac intranet.

## 12.3 SUMMARY

- WE**
- report potential law breaking or violations of the Code of Conduct to the line manager or Compliance or alternatively via the reporting system.
  - protect whistleblowers from negative consequences or reprisals by ensuring anonymity.
  - take every report seriously. All reports are thoroughly and conscientiously checked



# Contact

Your contact person:

If there are any questions about our Code of Conduct, our employees can contact Compliance:

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