



Improving health together

Code of conduct of GHD GesundHeits GmbH
Deutschland group of companies

Code of conduct

of GHD GesundHeits GmbH Deutschland group of companies

Preamble

As one of the leading companies in the healthcare market, our high-quality products and services have become synonymous with trust and growth – and people are always at the heart of our work. The issue of compliance is of great importance to us in our everyday work. We comply with all applicable laws. To ensure this, we have established the following mandatory principles of business and conduct that apply to all business divisions. It lays down the principles that form the basis for our decisions and actions. As an integral part of the Conditions of Employment, all employees must comply with these principles. Our management team leads by example.

We do not tolerate violations of the following principles.

Conflicts of interest

We ensure that personal interests do not conflict with the interests of the company.

We ensure that personal interests of our employees do not conflict with the interests of our company or the interests of our business partners. Our employees disclose any actual or even potential conflicts of interest to their respective superiors. Our employees put aside their own interests when carrying out their professional duties, focusing solely on the interests of our company and our business partners.

Anti-corruption and compliance

We comply with all applicable laws and regulations. We do not offer or accept any illegal advantages or benefits.

When carrying out our business activities, we observe and comply with all laws and regulations applicable to our business.

We do not offer illegal advantages to public officials or to other persons to further interests unfairly, nor do we accept such advantages during any of our business activities.

This is why we refuse to allow our employees to receive gifts or invitations to events with a largely recreational nature from (potential) business partners. We want to avoid the fact that our employees are exposed to an expectation of gratitude.

We adhere to the following principles when collaborating with employees in medical facilities and all other members of specialist groups:

- **Principle of separability:** Donations must have no connection with purchasing decisions.
- **Principle of transparency:** All donations and payments must be disclosed.

- **Principle of documentation:** Services must be documented in writing. The results of ongoing services such as study projects or advisory services and contract implementation must be documented on a regular basis.
- **Principle of equivalence:** Payment for a service and the service provided must be in reasonable proportion.

Fair competition

We adhere to rules on fair competition. We reject unfair business practices.

We acknowledge fair, undistorted competition to be an important driving force for developing the healthcare market. We value and respect fair competition. We reject unfair business practices. For the benefit of all market participants, we are committed to fair competition by complying with all antitrust laws and regulations. We value fair, honest behaviour towards customers, competitors, patients, government agencies and employees.

Product safety and quality

Our products meet the highest requirements in terms of quality. Our services are provided by highly qualified and regularly trained and certified employees.

The quality of our products and services provides the foundation for our customers' high levels of satisfaction and therefore, the success of our company. Customer satisfaction and safety is of paramount importance to us. We, therefore, demand that our products and services always meet the highest quality standards. Our products are subject to strict quality controls and are therefore safe and reliable. Our services are carried out solely by highly qualified and regularly trained and certified staff. Thanks to our quality management system, we make sure that our product and service quality standards are ensured in practice.

Data protection

We protect confidential data from being misused.

We respect the privacy rights of our employees, patients, customers and business partners. We collect, process and use personal data only to the extent required by law. Documents that contain the personal data of our employees, patients, customers and business partners are treated as confidential, and we take special precautions to protect them from unauthorised access. Our Data Protection Officer monitors our lawful use of data.

GHD property and assets

GHD property and assets must be protected.

GHD property and assets are essential for the development of the company and therefore, require special protection. Misuse is prohibited. Company property may not be sold, loaned nor used for non-company purposes without express permission. It must be treated with care.

Information regarding GHD

Confidential business information must not be disclosed nor used for personal gain.

Maintaining the confidentiality of business information is a prerequisite for our continued success. Confidential information includes information on internal GHD processes, non-public information on the company's business strategy, financial situation and all operational and business secrets, as well as such information concerning GHD business partners. This confidential information must not be disclosed to third parties nor used for personal gain. If confidential information is disclosed to business partners, the business partners are also required to maintain confidentiality.

Health and safety in the workplace

We create healthy and safe working conditions for our employees. All of our employees must comply with the applicable occupational health and safety regulations.

Employee satisfaction is a key factor in our company's success. It is essential that our employees' working environment is healthy, safe and based on mutual respect. We are aware of our responsibility towards our employees.

We always take all of the necessary precautionary measures to protect our employees. At the same time, we expect our employees to be autonomous and proactive in order to prevent hazards and to comply with all relevant occupational health and safety regulations. We support them in this by providing adequate education and training.

Equal opportunities

All employees and applicants have equal opportunities.

We value cultural diversity. We do not accept discrimination against people on the grounds of their gender, age, religion, sexual orientation, ethnicity or any other characteristic protected by law. All applicants have an equal opportunity to join the company, and all employees have an equal opportunity to be promoted.

Environmental protection

We protect the environment thanks to our sustainable business practices.

We place great importance on sustainable management. We, therefore, prefer suitable environmental behaviour and observe all relevant regulations for protecting the environment.

Ahrensburg, September 28 2017

*Management Board of GHD GesundHeits GmbH Deutschland
group of companies*

