

# CODE OF CONDUCT

## Preface

As a third-generation family business, we at TRACOE medical GmbH want to build on our longstanding traditions and experience and continue to live up to the values of **humanity and honesty** for our customers, suppliers, partners and employees. In addition to our **reliability**, our objective is to **grow sustainably**, so that we can continue to expand on our global successes.

In order to fulfil our exacting quality standards, we rely on motivated and qualified staff and their continued development. The development and production facilities in Germany allow us to continually develop new, high-quality and innovative premium products. We want to continue to stand for **quality made in Germany** in the future too and provide a secure and interesting working environment for our staff.

## Scope of validity

TRACOE medical GmbH is committed to implementing this Code of Conduct worldwide for all employees and representatives of TRACOE medical GmbH. At the same time, it is important to us that our business partners also adhere to this Code.

## Corporate values

Our corporate mission emphasises in particular our responsibility towards both our fellow humans and nature as well as the need to foster fairness and tolerance. This includes the following principles:

- Legally compliant and ethically impeccable behaviour, compliance with and observance of legal and cultural conditions.
- Treatment of employees and third parties is fair, polite and respectful.
- The interests of customers and business partners are accorded adequate consideration.
- Social commitment.
- Any form of discrimination on grounds of gender, race, religion or other features is prohibited.
- Professionalism, fairness and reliability are a top priority in all our business relations.

## Compliance with legislation

All our business partners must observe their respective national legal provisions, in particular legislation relating to employment and social security, and environmental protection regulations. Employment contract arrangements or similar measures must not circumvent the Code of Conduct.

## Human rights

We respect and abide by human rights in accordance with the UN definition and also expect this of our staff and our business partners.

## Treatment of employees and business partners

All employees must, without exception, be treated with respect and dignity. Any kind of physical punishment or abuse, psychological and sexual harassment and/or abuse or any other form of intimidation are forbidden.



Disciplinary sanctions must not infringe national legislation and internationally recognised human rights. Employees, who make a complaint regarding infringements of the rules of this Code of Conduct or of the national legislation, must not be subjected to any form of disciplinary action.

The relationships with our business partners should be characterised by mutual reliability and sustainability. Our business partners expect us to act with honesty and integrity, that our conduct is courteous and that we show respect and fairness, and we expect the same of them. This includes ensuring that decisions are made and communicated in a transparent and comprehensible manner. These principles are also followed by management in their dealings with the employees, who, in turn, observe them in their interactions with each other.

### Anti-discrimination policy

We do not tolerate discrimination of any kind. All salaried staff and hourly-paid employees must be treated equally. No one may be subjected to harassment or discrimination on the basis of their race, colour, nationality, ethnic origin, gender, sexual identity, faith or beliefs, political opinion, age, physical constitution or appearance. All employees must respect the personal privacy of other employees. Sexual harassment and bullying are forbidden.

### Working hours

The regulations regarding hours of work are governed by the relevant national employment legislation and the Fundamental Principles devised by the International Labour Organisation (ILO). This includes freedom of association, the right to collective bargaining, the elimination of forced labour and child labour and of discrimination in respect of employment and occupation.

### Remuneration

All business partners guarantee to pay their employees a remuneration that is not below the statutory minimum wage. Overtime must be paid at the statutory overtime rates as a minimum. All employees must receive at least the social security benefits prescribed by law.

Illegal and unauthorised wage deductions as direct or indirect disciplinary measures are forbidden. Employees also have the right to be informed in an understandable manner about the full composition of their wage. Employees must be paid using a method that is practical for them (e.g. credit transfer).

### Documentation of the terms of employment

The employment must be based on a formal document such as an employment contract or letter of appointment. The business partners guarantee the written documentation of the working conditions. This document must provide information regarding the working and employment conditions including wages, time period and payment, pension benefits, holiday entitlement and period of notice. Circumvention of the applicable country-specific employment and social security standards and Code of Conduct is forbidden.



## Health and safety at work

Safety in the workplace is a fundamental principle for us. All contracting parties and employees are expected to comply with the safety regulations, to be aware of risks and to be mindful of these in all safety-relevant activities. This applies to all risks or hazards that the employees might encounter in the workplace. Identified accidents or potential hazards and possible exposure to hazardous materials as well as near-accidents must be reported immediately to the competent superior.

It is the responsibility of the management of the business units to set up and supervise a safety organisation. Each line manager is responsible for the protection of their staff and must instruct, train and supervise them accordingly and, where applicable, provide them with appropriate protective clothing. All managerial staff are required to undertake risk assessments, in order to identify and assess the risks and possible exposure to hazardous materials that people might encounter. This also includes organising occupational health care.

## Environmental protection

We are committed to the protection of our environment as a corporate goal and define the resource-efficient manufacture of all products as a mandatory factor of production. The following guidelines for environmental protection apply:

- We help to protect our environment; we use all-natural resources sparingly and avoid or reduce the impact on humans and on nature wherever possible.
- We incorporate the requirements of an intact environment into the development, design, manufacturing process, packaging and shipping of our products as well as into the improvement of procedures and the introduction of new systems and products.
- We expect compliance with all the laws and subordinate legislation for the protection of humans and the environment, also by our business partners.

As regards the disposal of waste, the method selected must be the most environmentally friendly disposal method that is also economically viable. Should any incidents occur that have an environmental impact, the competent departments of the company must be informed comprehensively and without delay and they, in turn, must arrange for the mandatory reports to be sent to the authorities.

## Anti-corruption

We undertake to abide not only by the United Nations Convention against Corruption but also by the German Act on Fighting Corruption in the Healthcare Sector [Antikorruptionsgesetz im Gesundheitswesen] pursuant to section 299a StGB (German Penal Code). It goes without saying that we also expect this of our employees and our business partners.

## Information and communication

This Code of Conduct is freely available to all our employees and business partners on our website [www.tracoe.com](http://www.tracoe.com). Anyone, who becomes aware of violations of this standard or of an active infringement of the rights specified and reaffirmed here, must contact TRACOE medical GmbH directly and inform the CSR representative in writing of the possible infringements:

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