tic Medizintechnik
Entwicklung Produktion Vertrieb

Compliance Code

tic Medizintechnik GmbH & Co. KG

Endelner Feld 9

46286 Dorsten · Germany

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Entwicklung Produktion Vertrieb

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Compliance Code of tic Medizintechnik GmbH & Co. KG Dorsten

1. Introduction

1.1 Objective

The shareholders and managing directors of tic Medizintechnik GmbH & Co. KG have adopted a Compliance Code which regulates the principles and objectives of our corporate actions.

This includes e. g.

- responsible actions,
- in compliance with applicable laws, and
- in compliance with our ethical goals and requirements.

This Code and its annexes are intended to implement these principles and objectives and to systematically ensure their compliance.

1.2 Scope of application

This Code shall apply directly to tic Medizintechnik GmbH & Co. KG. The management directors will review and implement the organizational regulations of this Code and its annexes for their suitability for the company and the nature of its business. As a result, it is the responsibility of the company's management to create a corporate organization which ensures implementation of and compliance with the tic Medizintechnik Compliance Code and which promotes the principles and values embodied in the Code.

1.3 Preamble

tic Medizintechnik GmbH & Co. KG is an innovative medium-sized company with a team of approx. 80 employees.

As one of the few medical technology companies in our business area, our core competence is not only sales. An in-house development department with associated production facilities ensures demand-oriented products of highest quality. In addition, this enables us to work flexibly, quickly, solution-oriented and customized with the best know-how.

The driving force behind our success is the ambition of all employees to align our corporate values, innovative spirit, passion and team spirit with the demands and opportunities of today's business environment.

This tic Medizintechnik Compliance Code is the binding guideline for implementing our corporate objectives. It creates an understanding of the legal framework, our basic corporate stance and the resulting obligations on the part of each individual. Compliance with the Code is the responsibility of anyone related to the tic Medizintechnik Group.

2. Responsibility

2.1 Responsibility of the individual

It is of outmost importance for tic Medizintechnik that applicable law as well as corporate guidelines are known throughout the company and complied with.

tic Medizintechnik is aware that this means utmost responsibility for each and every one. However, tic Medizintechnik does not leave anyone alone with this responsibility. In case of doubt, internal contact persons are available at any time, in particular executives and the persons responsible for compliance (see section 13).

Responsibility also means diligence with regard to dealing with business partners, such as customers or suppliers. Third parties who maintain business relations with tic Medizintechnik are also required to conduct themselves in accordance with the principles of this Code and applicable law.

Responsibility means for each and every one to ensure a consistent and coherent image of tic Medizintechnik. In so doing. it is obvious that internal company information must be treated with confidence. Any queries made by third parties with tic Medizintechnik, where the response is of relevance for the company's image, shall be reconciled internally with the respective responsible person to ensure a uniform image.

Finally, responsibility also means trustful cooperation with government agencies. tic Medizintechnik is committed to comply with the law. It is therefore in the interest of both the company and of each and every individual to end and, if necessary, to punish violations of the law by way of trustful cooperation with the government agencies.

2.2 Special responsibility on management level

Senior employees and executives at tic Medizintechnik have to lead by example. They put trust in their employees, set goals, promote individual responsibility and recognize achievements. The have to ensure that corporate values and guidelines are reflected in their own conduct and that customers trust us.

Senior employees and executives shall set up a working environment for employees which protects both the company and the employees against violations of laws and regulations.

2.3 Responsibility of tic Medizintechnik

tic Medizintechnik prepares and regularly monitors compliance with this Code by its employees and takes all necessary measures to prevent and, if necessary, punish violations.

tic Medizintechnik also applies its standards to its business partners and reserves the right to discontinue contractual relationships with such companies that act in violation of this Code, our corporate principles or the applicable law.

3. Integrity in business transactions

Corruption is a serious problem in many industries and countries. Moreover, bribery is a serious violation of the law in most countries.

The principles of mutual fair treatment and a corresponding reputation of tic Medizintechnik are essential for the successful conduct of our business. tic

Medizintechnik is convinced that the performance of its employees and the product quality are decisive for corporate success and therefore rejects corruption.

It is therefore in the vital interest of tic Medizintechnik to make our employees and business partners aware of any kind of bribery and/or unlawful benefits, whether direct or indirect, in the private sector or in the public sector and to prevent the same. This applies both to benefits from our employees to business partners and to those from business partners to our employees.

tic Medizintechnik is particularly committed to the four basic principles of the Bundesverband Medizintechnologie e.V. (German Medical Technology Association):

- Separation principle

  We strictly separate our sales business from other aspects of cooperation with our customers. This means that monetary and non-monetary benefits of any kind (e.g. services, gifts, cash benefits and non-cash benefits) to our customers must not be related to sales transactions that we negotiate and conclude with our customers.

- Transparency principle

  We act openly and transparently. In particular, we deal openly with all contractual and service relationships that we enter into or maintain with employees in medical facilities, both internally and externally.

- Documentation principle

  All monetary and non-monetary benefits that we provide to employees in medical facilities are recorded by us in writing.

- Principle of equivalence

  All services and considerations provided between us and our customers or us and employees in medical facilities must always be in reasonable proportion.

Each of our employees is obligated to inform himself/herself about the regulations in place at tic Medizintechnik regarding the handling of allowances (cf. Appendix 1: Allowance Policy) and, in cases of doubt or suspicion, to contact the person responsible for compliance in accordance with these regulations (cf. Section 13.2).

4. Fairness in competition

tic Medizintechnik and its employees are in a constant exchange of information and contact with customers, suppliers and partners. The exchange and cooperation of the representatives of competing companies or with customers must not under any circumstances have the consequence that regular or fair competition is impeded or even excluded. The law in particular prohibits agreements or collusive conduct in general with competitors with regard to prices or other conditions regarding market or customer allocation or respective similar unfair practices.

tic Medizintechnik explicitly commits itself to fair competition and lawful actions and aligns its sales activities strictly with applicable German, European, and international law. tic Medizintechnik expects its employees and all business partners to unreservedly commit to lawful actions and compliance with applicable laws and the present Code.

5. Protection of know-how and operating assets

The know-how developed by us and our employees forms, among other things, the basis of the business success of tic Medizintechnik. It is therefore in the interest and in the responsibility of all employees that business secrets are not disclosed to unauthorized third parties. All employees are prohibited from any unauthorized disclosure of business secrets and other confidential information as well as the unauthorized use of the same.

To ensure corporate success, employees will take business decisions based on a responsible, commercially expedient, comprehensible balance of benefits and risks and will document this in a suitable manner.
Each and every employee is furthermore aware that documentation in line with statutory requirements contributes to the protection of our operating assets. In particular, a clear, comprehensible, and complete keeping of records and files is indispensable to this end. Any circumstances of relevance for documentation and especially for accounting, must be documented fully and completely and in compliance with internal guidelines in a transparent manner.

Any destruction of documents takes place exclusively in compliance with laws and internal guidelines. The destruction of documents with the aim of keeping them from being noticed by government agencies or public bodies is prohibited.

The use of operating resources for personal respectively private purpose is permitted only if this has been explicitly approved (e. g. by line managers or employment contract).

6. Fair working conditions

tic Medizintechnik is aware of its responsibility for its employees. An attractive working environment for all employees is one central concern in this regard. This includes in particular fair remuneration with reasonable working hours, the promotion of the health of employees and the minimization of risks for employees by ensuring a high standard of work safety. The promotion of qualification and competence of employees is also of great importance.

tic Medizintechnik condemns child labor and any type of forced labor and in general any work under unfair or unsafe conditions as well as the knowing exploitation of this kind of work.

Ensuring fair and safe working conditions is also expected from our business partners.

7. Clear decision-making processes and separation of interest

tic Medizintechnik maintains organizational charts and additional information to clarify competences and decision-making processes at tic Medizintechnik. All employees are required to keep themselves constantly informed about processes relating to them and about relevant contact persons.

All employees at tic Medizintechnik must comply with the principle of strict separation of private interests of the individual and the company's interests. This includes that decisions regarding the company's interests are taken objectively and free from any influence by purely private interests and that potential conflicts of interests are at all times disclosed to the respective competent executive.

8. Product quality and safety

The products of tic Medizintechnik are characterized by their special quality. Quality consciousness and constant control of product quality are essential for tic Medizintechnik.

In addition to our own quality demands we are also responsible for the safety of all those using products of tic Medizintechnik. tic Medizintechnik provides training for its product development staff so as to ensure product safety at all times.

9. Sustainability and environmental protection

tic Medizintechnik and the employees working for us feel committed to the protection of the environment. This is associated with a responsibility for health and safety of all those using products of tic Medizintechnik in their daily lives.

tic Medizintechnik is committed to the efficient use of resources such as energy and raw materials. tic Medizintechnik will continue in the future to ensure sustainability and efficiency in the interest of the general public.

10. Fairness and equal opportunities

tic Medizintechnik expects its employees and business partners to treat each other with respect and to honor and comply with internationally recognized human rights standards. This particularly means that no person shall be discriminated against.

11. Compliance with foreign trade law

tic Medizintechnik is committed to compliance with national and international trade law. This is associated with the compliance of import and export bans, of customs and tax law, obtaining necessary permits, and compliance with any other foreign trade provisions as well as, in particular, also of anti-money laundering provisions. All employees and business partners are required to comply with trade bans and other restrictions in international payment and goods traffic and to report any violations or instances of doubts.

12. Data protection and IT Compliance

tic Medizintechnik is aware of the challenges posed by the information society and of the chances and risks associated with the digitalization of daily life.

tic Medizintechnik provides its employees and business partners with the technical infrastructure required to be able to attain a maximum of data protection and security in accordance with applicable law and, in particular, data protection regulations. All employees are required to comply with the applicable rules of data protection for their own protection and the protection of persons associated with tic Medizintechnik and are required to actively support tic Medizintechnik's efforts regarding data protection and IT security. Managers are particularly responsible for sensitizing employees in this respect and for ensuring and enforcing compliance with the company's requirements.

13. Organization and responsibility

13.1 Compliance as a process

Compliance is a process. It works only if it is constantly reviewed with regard to its

- suitability,
- up-to-dateness,
- and actually being observed.

This includes that changes to the laws which are of relevance for tic Medizintechnik are noticed by the competent departments, are reviewed with regard to their significance for tic Medizintechnik, and that any need for action is reported to the respective superiors or the compliance office. This is the task of each and every one as part of his/her job description.

Superiors and employees shall be periodically trained and the success of such training shall be reviewed and documented, if necessary.

Observation of the compliance rules shall be checked at random by way of audits. Frequency and intensity of such reviews will depend on the respective risk situation. Its determination falls within the responsibility of the company's management. It may delegate its relevant obligations but then has to review at random suitability of the delegate, the delegation, and its performance.

Lessons must be learned from compliance incidents. In particular, it must be reviewed to what extent the existing compliance system is suitable to prevent compliance incidents with reasonable effort.

Details regarding individual compliance topics are regulated in annexes to this Compliance Code which are subject to ongoing review and further development.

In case of new hires, it shall be ensured that new employees are familiarized with the tic Medizintechnik Compliance Code, its annexes and that they receive training regarding compliance topics which are of relevance for their respective area of work (onboarding process).

In case of leaving employees, it shall be ensured that any facts of relevance under compliance aspects are documented and that corresponding documents/data of such leaving employees are archived and stored taking into account the provisions of data protection laws.

13.2 The tic Medizintechnik Compliance office

tic Medizintechnik has set up a compliance office which coordinates all compliance activities at tic Medizintechnik, provides suggestions for the implementation of compliance at tic Medizintechnik, supports the company's management and the respective superiors in implementing compliance and further acts as a contact in compliance matters within the company (+49 (0)2369 . 20 85 - 35, compliance@ticmed.de).

Signed 1st July 2023 **Board CEO tic Medizintechnik GmbH & Co. KG**

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