

**Code of conduct**

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**1. Preamble**

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In addition to human rights and environmental protection regulations, the Code of Conduct includes anti-corruption regulations and applies to ANregiomed gKU and its affiliated subsidiaries. The mention of "ANregiomed" includes the subsidiaries.

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**2. Scope of application**

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ANregiomed

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**3. Risks / objectives - opportunities**

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Risks:

- Inappropriate behaviour by even just one employee can cause considerable damage to the hospital group.
- Offences against the Anti-Corruption Act, e.g. bribery in the healthcare sector, can be punished with a prison sentence of up to three years or a fine in accordance with Section 299a of the German Criminal Code.
- Violations of human rights and environmental protection.

Objectives-Opportunities:

- The reputation and success of the company are largely determined by the appearance, actions and behaviour of each individual.
- Adherence to the Code of Conduct, in particular the anti-corruption regulations relating to benefits from third parties, ensures that employees act in accordance with compliance requirements.
- Compliance with human rights and environmental protection (see Supply Chain Due Diligence Act).

Key Performance Indicators:

- The compliance audits are carried out within three days of receipt by Internal Audit.
- No serious violations in corruption prevention audits.

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**4. Responsible parties and interfaces**

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Each individual is required to take care of the company's reputation with patients, customers, business partners, associations, politicians and the press, etc. It is also essential that each individual commits to upholding the law and is guided by objectivity and always independent of individual interests when carrying out their duties. Compliance is therefore not just the responsibility of the Executive Board and managers, but an overall task for all employees.

Audits for compliance conformity of "sponsoring" are carried out by Internal Audit.

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**5. Definitions / Definitions of terms**

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Compliance Management System

A compliance management system refers to the entirety of the measures and processes set up in the company to ensure compliance with regulations.

Compliance is characterised by the fact that the company becomes a "learning system". The aim is to continuously improve the handling of all internal and external regulations and to take all risks into account appropriately. The introduction of a compliance management system also obliges companies to define their business processes, create transparency and establish an effective organisational structure.

The compliance management system in ANregiomed is to be systematically developed and structured.

The topic of "Compliance" is described in more detail in the following "Code of Conduct". The code of conduct is not an exhaustive list. Additional lines of action can be drawn up to supplement and expand the code.

Principles of business relationships with third parties

In business relationships with third parties, all employees must disregard private and personal interests and act solely for the benefit of the company. All conflicts of interest and loyalty must be avoided. If a third party creates a conflict situation, the line manager must be informed.

If employees have private business relationships with third parties with whom they have business contacts, conflicts of interest and loyalty must also be ruled out. The line manager must be informed of this. There is also an obligation to provide information in the event that life partners or family members have private business relationships with third parties with whom the employee has business contacts and from which conflicts of interest or loyalty may arise.

Furthermore, employees may not act on behalf of the company in their own affairs. Acting on behalf of life partners and family members is also deemed to be a personal matter. If the official activity affects personal matters, the line manager must be informed of this.

Supply Chain Due Diligence Act

The aim of the Supply Chain Due Diligence Act is to prevent or minimise violations of human rights or environmental protection within supply chains. The law will apply to all companies with at least 1,000 employees from 1 January 2024.

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**6. Applicable documents / templates / software / references**

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- See under References (Auf)

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**7. Procedure**

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- Compliance with this Code of Conduct is one of the key responsibilities of every employee.
- Any violation may result in disciplinary action and sanctions. If there are any doubts regarding the application or interpretation of this regulation, these must be discussed with the

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The employee's immediate superior or the internal audit department should be consulted. If there is uncertainty as to whether one's own actions are correct and appropriate in terms of the Code of Conduct, the immediate superior or Internal Audit can be approached.

- Any employee can submit personal complaints or circumstances that indicate a violation of the Code of Conduct to the Executive Board.
- Assurance is given that the matters raised will be subject to a thorough and confidential review and, where appropriate, appropriate action will be taken.

**8. Explanations of the Code of Conduct process****Integrity and mutual respect**

- Integrity and mutual respect are the highest standards in relationships and communication between employees and with third parties. The personal dignity, privacy and personal rights of each individual must be respected in every respect. The behaviour of each individual is characterised by reliability and responsibility.
- Discrimination, harassment or offence in the working environment, whether based on race, ethnic origin, gender, religious affiliation or ideology, disability, age or sexual identity, will not be tolerated in any way.
- We are aware of our role and responsibility as a healthcare company in society and act accordingly. ANregiomed acts fairly, legally, considerately and courteously and contributes to the promotion of fair and sustainable standards, social conditions and environmental protection.
- Our goal is to continuously improve the performance and awareness of all our employees and business partners worldwide. At ANregiomed, we lead by example and act with integrity, professionalism and great care.

**Employees, responsibility and leadership**

- Trust, courtesy and mutual respect characterise the relationship between employees. Every employee must work to fulfil the interests of the company, protect the company's assets and use its resources sensibly and responsibly.
- Each member of staff takes account of the changing requirements and expectations of patients and clients with regard to professional service, treatment and care by undergoing regular training on their own responsibility.
- The key criteria for exercising management responsibility are exemplary personal behaviour, performance, openness and social skills. Managers promote the responsibility and initiative of their employees in a spirit of mutual trust.

**Voluntary commitment of ANregiomed employees**

- ANregiomed sees voluntary work as an important contribution to regional development. When carrying out voluntary work, it must be ensured that the interests resulting from the voluntary commitment do not conflict with the interests of ANregiomed. Care must be taken to ensure this,

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that the honorary position does not exceed a reasonable scope and that the contractual obligations can be fulfilled without impairment.

### Dealing with ANregiomed property

- ANregiomed property is used by employees to fulfil their duties and may only be used for official purposes. Private use of work equipment or other items is only permitted if this has been expressly agreed and regulated in writing.

### Data protection and confidentiality

- The data of our patients, customers, business partners and employees must be handled responsibly. Confidentiality must be maintained regarding internal company matters.

### Occupational health and safety

- Working conditions must be organised in such a way that the health and safety of employees is protected.

### Environmental protection

- Protecting the environment and conserving its resources are goals of the company and a priority.
- The company implements and continuously improves environmentally friendly practices in all facilities in which it operates. It fulfils the environmental protection requirements and standards applicable to its respective facilities and uses natural resources responsibly.

### Forced and child labour

- No forced labour of any kind, including forced labour in prisons and through slavery, shall be used. No illegal child labour shall be used. Unless local legislation prescribes a higher age limit, no persons are employed who are still of school age or under the age of 16 (subject to the exceptions under ILO Convention 138).

### Business relationships with customers

- Correctness, honesty, professionalism, transparency and the greatest possible cooperation characterise the principle of our relationships and communication with our patients, customers and contractual partners. As a reliable partner, we honour all commitments made to third parties in this context.
- The aim here is to guarantee patients, customers and partners a high standard of quality in the provision of our services and thus achieve lasting satisfaction.

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- Bidders and suppliers must not be unfairly favoured or hindered when competing for contracts. Every tender must be examined impartially. Contracts are always awarded on the basis of objective and comprehensible criteria (e.g. quality of services or products) and in compliance with the award principles for municipal contracting authorities.
- Employees involved in the awarding of contracts must inform their line manager of any personal interest that may exist in connection with the performance of their official duties.

**Contributions and gifts from third parties**

- According to Section 3 (2) TVöD VKA and Section 3 (2) TV-Ärzte/VKA, employees may not accept any rewards, gifts, commissions, favours or gratuitous benefits from third parties in relation to their work that objectively improve their position either materially or immaterially (advantage). This applies regardless of whether the benefit is intended for the individual employee or a wider group of employees. An advantage also exists if it only benefits the employee indirectly, e.g. in the case of benefits to relatives of the employee.
- Exceptions are only possible with the consent of the employer. If such benefits are offered, the employer must be notified immediately.
- As an exception, tacit consent may be assumed in the following case:
  - Minor gifts are accepted up to a maximum value of 20 euros per supplier/bidder per year. Minor gifts are understood to be promotional items of a simple nature such as pens or calendars.

**Please note that**

- any form of cash or vouchers may not be accepted.
- Benefits may not be accepted in the context of contract initiation.
- Benefits to the private address are to be prevented.
- all gifts offered and displayed above a value of 20 euros per supplier/bidder per year must be authorised by the employer before acceptance or use.
- The employer must be notified immediately of any gifts offered or accepted with a value of more than 20 euros to the management secretariat ([vorstand@anregiomed.de](mailto:vorstand@anregiomed.de)). The notification must include the nature of the gift and the name of the gift-giver. Companies must be named. If the gift giver is a patient or relative, only the following must be stated for data protection reasons: "patient" or "relative".
- After approval or rejection by the Executive Board, feedback is sent via the management secretariat, if necessary with notification of the further procedure.

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### Benefits from ANregiomed to employees

- Benefits in kind to employees are regularly part of their taxable salary. There are exceptions to this rule:
  - Occasional gifts of up to 60 euros are not subject to income tax or social security contributions. Such occasional gifts are, for example, flowers or books that are given to the employee on a special occasion. The 60 euros is an exemption limit. If the occasional gift exceeds the amount of 60 euros, the entire amount is subject to tax and social security contributions.
  - There is a monthly exemption limit of EUR 44 for non-cash benefits without a special personal reason (de minimis limit).
- In order to ensure that exemption limits are not exceeded and tax regulations are complied with, benefits must always be reported to the DLZ HR.

### Benefits from ANregiomed to volunteers

- Volunteers working for ANregiomed may receive gifts for exceptional commitment. The principle of appropriateness and social adequacy applies. Social adequacy means that the reward must be appropriate to the volunteer's activity and function.
- Gifts or so-called thank-you events for volunteers are generally to be counted as a non-cash benefit towards the voluntary work allowance (720 euros/calendar year), i.e. the value, together with the remuneration paid out, may not exceed the allowance in total, as otherwise an employment relationship may arise.

### Sponsoring for events (organised by ANregiomed)

- The acquisition of sponsorship funds for the financial support of events is permitted within reasonable limits. The following principles must be observed:
  - **Segregation of duties and separation principle**
    - Grants are made independently of procurement decisions.
  - **Transparency principle**
    - All benefits and remuneration must be disclosed to the management.
  - **Documentation principle**
    - All services must be specified in writing.
  - **Equivalence principle**
    - Performance and consideration must be in reasonable proportion to each other.
- The sponsors, usually medical device or pharmaceutical companies, must have a justified and comprehensible interest in the presentation of their products and services or in the display of information brochures relating to the sponsored event. The sponsored event must be related to the content of the products and services. Criteria for the appropriateness of the amount of funding include the number of expected participants, the image-promoting relevance of the event and the duration of the event.

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- If it is a medical event or training organiser, the type, content and presentation of the training event must be determined solely by the medical organiser.
- In order to utilise sponsorship funds, it is generally necessary to conclude a written contract with the sponsor prior to the event, which has been checked for compliance by Internal Audit and signed by the Management Board.
- Invoicing takes place via the DLZ E&L, so that a separation between the solicitation of sponsorship funds and invoice processing is preventative in terms of the Anti-Corruption Act.

**Expenses for events (organised by ANregiomed)**

- The principle of austerity must always be applied to expenditure for events. Expenditure on hospitality, printed materials, giveaways or gifts for speakers etc. must not exceed a reasonable level. If sponsorship funds are acquired for the event, care must be taken to ensure that the costs of the event do not fall significantly below the amount of the sponsorship funds. In addition, care must be taken to ensure that the sponsorship funds are used for a specific purpose and in accordance with the contract. Proof of this is provided by means of a statement of costs for each event.

**Sponsoring for participation in externally organised events (training courses, congresses, workshops, etc.)**

- Invitations to participate in events, training courses and conferences, the assumption of catering, travel and accommodation costs are also among the benefits that employees may only accept after a prior compliance check by Internal Audit and the approval of the Executive Board. The assumption of costs by third parties is only permitted if the event serves to disseminate professional knowledge, is related to the participant's specialist area or field of activity and the event is predominantly of a scientific nature.
- The four principles - separation principle, transparency principle, documentation principle and equivalence principle - must also be observed in the case of further training. The following are considered appropriate when covering the costs of
  - **Arrival/departure:**
    - Air travel: Economy Class
    - Rail: 1st and 2nd class
    - Car: 0.30 Euro per kilometre
  - **Overnight stay:**
    - Hotel category: maximum 4-star level
    - Location: Town is not particularly attractive for tourists (recreational value is not in the foreground)
  - **Conference fees:**
    - Conference centre is not "known for its entertainment value".
  - **Catering:**
    - Work or dinner up to max. 75 euros incl. drinks
      - Not permitted: Luxury, gourmet restaurant, experience gastronomy
    - Snacks and drinks during the event

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In principle, they may not be accepted:

- Refunds or discounts for accompanying persons
- Assumption of costs for supporting and entertainment programmes

**Sponsoring for hospitality at other events**

- Financial support from third parties for company events and celebrations on the occasion of birthdays, anniversaries or specific holiday festivities is not permitted.
- Hospitality may be authorised if it is provided on the occasion of official activities, meetings, visits or the like, which serve to prepare or carry out certain official measures, which are based on the rules of communication and courtesy and which the employee cannot avoid without violating social conventions.

**Speaker/consultant activities**

- The offer of a speaker activity can only be accepted after a prior compliance check by Internal Audit and approval by the Executive Board (with the exception of unpaid speaker activities). A written agreement is generally required, whereby the topic of the lecture or the consultancy service should be related to the products or therapies developed by the donor or should be related to the donor's fields of activity.
- The four principles described under "Sponsorship for events" must be observed. The following criteria can be used to assess whether there is an appropriate relationship between performance and consideration:
  - Difficulty of performance
  - Expertise in service provision
  - Time required
  - Standard market remuneration
  - Orientation towards the official scale of fees (Amtliche Gebührenordnung)
- In addition to an appropriate fee, necessary travel and accommodation costs as well as catering costs may also be reimbursed. The reimbursement of purely private costs (e.g. for travelling companions, telephone or entertainment activities) is not permitted.
- Payment of fees and expense allowances must always be made to the account of ANregiomed or to the account of the subsidiaries. The pro rata payment to the speakers is made after receipt of the payment via the payroll and depends on whether the preparation and follow-up work as well as the giving of the lecture or the counselling activity took place during or outside working hours.

**Third-party funding for participation in studies**

- In order to ensure compliance-compliant third-party funding commitments for clinical studies or observational studies, it must be guaranteed that the third-party funds are used exclusively to promote research and teaching. In the area of third-party funding, too, the four principles -

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separation principle, transparency principle, documentation principle and equivalence principle. In principle, participation in studies or observational studies is only possible after a prior compliance check by Internal Audit and approval by the Executive Board. Before concluding a contract, it must also be ensured that it is accompanied by the ethics vote of the third-party funder.

- Invoicing takes place via the DLZ E&L, so that a separation between the acquisition of third-party funds and invoice processing has a preventative character in terms of the Anti-Corruption Act. In order to maximise transparency, third-party funds must always be recorded in a separate "third-party funds account". Invoicing after project completion should provide evidence of the extent to which performance and consideration are in an appropriate relationship to each other.

**Other third-party services / benefits**

- Other third-party services may only be utilised by employees for private purposes at standard market conditions. The acceptance of benefits at special conditions is not permitted. The same applies to life partners and family members who utilise benefits from third parties with whom the employee has a business relationship. The only exceptions to this are benefits that are made available to all employees and have been authorised in advance by the management.

**9. List of abbreviations**

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REV	= Revision
StudZ	= Study centre
DLZ	= Service Centre
HR	= Human Resources
E&L	= Purchasing and Logistics
TV(öd)	= collective agreement for the public sector
VKA	= Association of Municipal Employers' Organisations