

CODE OF CONDUCT

Introduction

RUDOLF Medical GmbH + Co. KG (hereafter referred to as **RUDOLF Medical**) believes in socially responsible business. Promoting decent working conditions and environmental practices in our supply chains is part of our strategy to act in a socially responsible manner. In pursuit of this aim, we therefore cooperate closely with our suppliers and business partners.

RUDOLF Medical's Senior Management has adopted this Code of Conduct to clarify what we expect and require of both ourselves and our business partners. The code concerns conditions in our own operations and in our supply chain and sets out basic expectations and requirements relating to human rights, worker's rights and the environment as stated in international conventions and national legislation.

Principles

RUDOLF Medical and its suppliers and service providers commit themselves to comply with the production of goods and the provision of services to the present Code of Conduct. In addition, the suppliers commit to forward this Code to their subcontractors and ensure that these adhere to the Code.

RUDOLF Medical expects its suppliers and business partners that they systematically and deliberately strive to ensure compliance with this Code of Conduct.

RUDOLF Medical will continue to support its business partners in the implementation of the Code of Conduct.

RUDOLF Medical will in future pay attention when selecting new suppliers that they pay attention to decent working conditions for their employees and to environment protection.

At **RUDOLF Medical's** request, a supplier must be able to document either existing compliance with the code of conduct or its on-going efforts to achieve such compliance. This documentation may be provided through self-declaration forms, surveys of working conditions and environmental practices or meetings with **RUDOLF Medical**.

The supplier will be obliged to provide contact information for any sub-supplier that **RUDOLF Medical** wishes to inspect.

Internal requirements

RUDOLF Medical will continually seek to improve its policies and business practices so as to assist its suppliers in complying with the code of conduct.

Neither **RUDOLF Medical** nor any of its employees shall ever offer or accept illegal/unlawful monetary gifts or other forms of remuneration in order to secure business-related or private benefit, or benefit for customers, agents or suppliers.

Requirement relating to working and environmental conditions

This code of conduct is based on internationally acknowledged UN and ILO (International Labour Organization) conventions and sets out a minimum standard. The employment legislation applicable to the place of production must be respected. Where national laws and regulations cover a topic that is also dealt with in this code of conduct, the higher standard shall apply.

1 Freely Chosen Employment

(ILO Conventions Nos. 29 and 105)

- 1.1 There shall be no forced, bonded or involuntary prison labour.
- 1.2 Workers shall not be required to lodge "deposits" or identity papers with their employer and shall be free to leave their employer after reasonable notice.

2 Freedom of Association and the Right to Collective Bargaining

(ILO Conventions Nos. 87, 98, 135 and 154)

- 2.1 Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 Workers representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.
- 2.3 Where the right to freedom of association and collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

3 No Child Labour

(UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 and 79 and ILO Recommendation No. 146)

- 3.1 Children and young persons under the age of 18 shall not be engaged in labour that is hazardous to their health or safety, including night work.
- 3.2 Children under the age of 15 (14 or 16 in certain countries) shall not be engaged in labour that is detrimental to their education.
- 3.3 New recruitment of child labour in infringing of the above-mentioned conventions is unacceptable. If child labour, as described above, is already in existence, sustained efforts shall be made to redress the situation as quickly as possible. However, the children concerned shall be given the possibility of earning a livelihood, as well as acquiring an education until they are no longer of compulsory school age.

4 No Discrimination

(ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women)

- 4.1 There shall be no discrimination at the work place based on ethnic background, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- 4.2 Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behaviour, and from discrimination or termination of employment on unjustifiable grounds, e.g. marriage, pregnancy, parenthood or HIV status.

5 No Harsh or Inhumane Treatment

- 5.1 Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, shall be prohibited.

6 Safe and Hygienic Working Conditions

(ILO Convention No. 155 and ILO Recommendation No. 164)

- 6.1 The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 6.2 Workers shall receive regular and documented health and safety training, and such training shall be repeated for new workers.
- 6.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 6.4 Accommodation, where provided, shall be clean, safe and adequately ventilated, and shall have access to clean toilet facilities and potable water.

7 Adequate Wages

(ILO Convention No. 131)

- 7.1 Wages and benefits paid for a standard working week shall meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs.
- 7.2 All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.
- 7.3 Deductions from wages as a disciplinary measure shall not be permitted.

8 No Excessive Working Hours

(ILO Convention No. 1 and 14)

- 8.1 Working hours shall comply with national laws and benchmark industry standards, whichever affords greater protection. It is recommended that working hours do not exceed 48 hours per week (8 hours per day).
- 8.2 Workers shall be provided with at least one day off for every 7-day period.
- 8.3 Overtime shall be limited. Recommended maximum overtime is 12 hours per week.
- 8.4 Workers shall always receive overtime pay, minimum in accordance with current legislation.

CONDITIONS OUTSIDE THE WORKPLACE

9. Protection of the Environment

- 9.1 Environmental measures shall be taken into consideration throughout the production and distribution chain ranging from the production of raw material to the consumer sale. Local, regional and global environmental aspects shall be considered. The local environment at the production site shall not be exploited or degraded by pollution.
- 9.2 National and international environmental legislation and regulations shall be respected.
- 9.3 Relevant discharge permits shall be obtained where required.
- 9.4 Hazardous chemicals and other substances shall be carefully managed.

Fridingen, 15 February 2023

RUDOLF Medical GmbH + Co. KG

Ulrich Rudolf
President