

# Code of Conduct

## English Version



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# I. Foreword

Dear Colleagues,

at Henke Sass Wolf, we are aware of our mission to manufacture high-quality medical technology products, contribute to medical progress, and improve people's lives. We are determined to achieve this in a responsible manner, as a reliable and fair business partner.

Our "Code of Conduct" serves as a guide for all employees and stakeholders to ensure that we conduct our business in compliance with national and international legislation and meet the highest standards of the medical device industry.

The principles listed below may seem self-evident, but even self-evident principles must be documented and reinforced. Values that are not anchored in practice can lose their value. The content of this Code is intended to provide guidance in the everyday work and to strengthen the compliance awareness throughout the company.

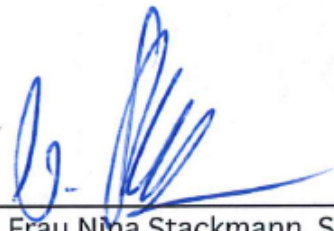
We place greater importance to continuous improvement than to an error-free work culture. Mistakes are viewed as opportunities for learning, and we highly value open communication. Value-driven behavior offers security and guidance. It is equally important to us that the management and executives act in accordance with the law and with integrity, and that business partners and third parties are treated with respect and fairness.

Tuttlingen, 20.05.2025

Place, Date



Frau Kathrin McKenna, Shareholder



Frau Nina Stackmann, Shareholder



Herr Henner Witte, CEO



Herr Michael Appl, Co-CEO

## II. Responsibility in the Workplace







## Health and Safety

Henke Sass Wolf offers all employees a safe and healthy working environment. We spare no effort to prevent accidents at work and to further improve occupational safety. In all cases, employee health and safety conditions must be in accordance with current local legislation and culture. We identify both occupational risks and external hazards and operate programs that are proportionate to the risks in order to actively prevent or mitigate these.

It is our goal to create a safety culture that is practiced by our managers and employees. We take responsibility for ourselves and our colleagues and develop an awareness of possible risks in the respective working environment.

### Example

You notice that there are not enough protective shoes with steel toe caps available for the interns. Do not look the other way when others are working in unsafe conditions, even if they don't realize it. No compromises should be made when it comes to occupational health and safety. Contact the relevant executive. Otherwise, you can contact the following persons depending on the incident.

### Contact

Occupational Safety Specialist  
Safety Officer  
Company Physician/ First Aider

Fire Protection Officer/Fire Protection Assistant  
Electricians  
Laser/Radiation Protection Officers

## Dealing with Each Other and Equal Opportunities

Henke Sass Wolf promotes respectful, tolerant and collaborative interaction with one another. We resolve conflicts peacefully and without prejudice.

We are determined to create a working environment free of discrimination, violence and harassment. We consider the diversity of our employees to be one of our greatest strengths. Everyone is treated equally, regardless of age, gender or gender identity, sexual identity, origin, culture, nationality, religious affiliation, ideology, social background, disability or chronic illness. Any behavior to the contrary will not be tolerated. The same applies when dealing with customers and suppliers.

### Example

- A meeting becomes heated and insults are hurled.
- A colleague is excluded from lunch because of her headscarf.

Take a stand. Let them know that such behavior is not welcome. Support colleagues who are being discriminated against.

### Contact

HR Department





## Data Protection

As part of our business activities, we collect and process personal data from employees, customers and business partners on a daily basis. We always comply with the current legal requirements, especially the EU General Data Protection Regulation (GDPR) and respect the personal rights of every person. We are aware of the consequences that a data leak can have for individuals or companies.

It is therefore important to us to always treat data confidentially and to protect it from unauthorized access. Personal data may only be collected, processed or used if this is necessary and there is a corresponding legal basis or consent from the data subject. The use of data must be transparent for the data subjects. Their rights to information and correction and, if applicable, to objection, blocking and deletion must be safeguarded.

### Example

- The loss of a work device on which confidential customer data is stored without reporting this immediately
- During a trade fair, you receive the e-mail addresses of potential customers as part of a competition. Personal data collected for a specific purpose may not automatically be used for other purposes. For example, you may not include the email address in a newsletter without the consent of the person concerned.

### Contact

Data Protection Officer  
Data Protection Manager  
Competent Supervisory Authority for Serious Data Breaches

## IT Security

We observe IT and data processing security and adhere to the applicable regulations. IT security is crucial to protecting our business processes and the confidentiality of our data. Every employee has a responsibility to contribute to the security of our IT systems. This includes preventing malware, viruses, phishing and social engineering tactics. We develop concepts for data backup and recovery, regulate the protection of confidential information and regularly monitor access rights.

### Example

Opening an e-mail attachment from an unknown source, resulting in the infection of the entire company network with malware.

Use of an external USB stick without approval from the IT department

### Contact

IT Department  
Data Protection Officer  
Data Protection Manager





## Intellectual Property

We value and respect intellectual property and the rights of third parties. It is our duty to ensure that we do not infringe copyrights, trademarks, patents or other intellectual property rights. This means that we do not use or distribute copyrighted materials without appropriate authorization and do not take any actions that violate the intellectual property rights of others.

At the same time, we ensure through our actions and communication that our own knowledge is protected against unauthorized disclosure or misuse. This knowledge – including technical know-how, patents, and trade secrets – forms the foundation of our success.

### Example

You create a presentation intended for a customer meeting. You use images or graphics from other companies or from publicly available sources for this purpose.

The unauthorized use of copyrighted material without permission or a license could constitute a violation of copyright law. Only use images from the internal archive or from open-source-sources or "royalty-free" media.

### Contact

Research and Development  
Compliance

### III. Responsibility as a Business Partner







## Product Compliance

First-class quality, continuous optimization and ensuring the performance of our products are top priorities at Henke Sass Wolf. We have a responsibility to our customers, patients and society to ensure product safety. During development and production, we comply with the legal and regulatory requirements of the country in which we operate, as well as international standards in the medical device sector. This also applies to the approval, marketing and use of all products.

Our aim is to inspire with excellent and innovative products, services and industry solutions. We have established processes to ensure quality management. Safety or quality concerns must be reported immediately, regardless of their cause or severity.

### Example

You learn of a possible product defect in an online forum. The causes of potential product failures can be very complex and must be thoroughly investigated. Please do not comment on such incidents unless you are authorized to do so. Careless statements may result in reputational damage or liability consequences.

### Contact

Quality Management Officer  
MDR Officer

## Fair Competition and Antitrust Law

We recognize the principles of free competition and act accordingly. Henke Sass Wolf does not participate in illegal agreements or practices that restrict competition, such as collusion regarding prices, terms, or market sharing. Unfair agreements and ethically questionable practices, such as bribery or the intimidation of individuals from competing companies, are not tolerated at Henke Sass Wolf. We are fully committed to complying with all antitrust regulations.

We are aware that violations of these regulations can lead to penalties of up to 10% of the Group's total revenue or result in bans on business operations. Whether in Europe or worldwide, we adhere to the high standards of European antitrust law across borders.

### Example

You are speaking with competitors at a medical device trade fair. Never attempt to obtain information about competitors without clearly identifying yourself as an employee of Henke Sass Wolf. Withdraw from any conversation involving topics such as bid rigging, price fixing, market or customer allocation and refrain from disclosing any confidential information. If you suspect that confidential documents from competitors have inadvertently reached us or that our documents have reached competitors, contact your line manager or Compliance.

### Contact

Compliance





## Bribery and Corruption

We firmly reject all forms of corruption and bribery. Our success is based on product quality, flexibility and a willingness to provide service and should never be achieved through unfair inducements. Corruption hinders innovation and fair competition. No bribes or other illegal inducements may be offered, paid or accepted, either directly or via third parties. We comply worldwide with all applicable laws and internal regulations for combating corruption. Our business partners trust the professional judgment of our employees.

### Example

The representative of a large state hospital approaches you and asks whether his son could complete an internship at Henke Sass Wolf.

The provision of an internship may be regarded as a pecuniary benefit intended to gain an improper advantage from a government institution. In particular, the granting of advantages to public officials may be punishable as the acceptance or granting of an advantage simply because it is done with regard to the official position. The performance of official duties does not need to be improperly influenced. Any person entrusted with the performance of public duties may be a public official, not just civil servants and public sector employees. Please refer the individual to the official application process.

### Contact

Compliance

## Gifts and Invitations

Gifts, business meals and events for informational, representational, or entertainment purposes can be legitimate ways of establishing and maintaining business relationships. However, they may never be used to gain unfair business advantages and may never be given to an extent or in a manner that could call into question the professional independence and judgment of the parties involved. All such benefits must be disclosed and fully documented. We strictly reject any kind of cash gifts, gifts to private addresses or benefits prior to contract and award decisions. On the other hand, non-personalized promotional items are generally unproblematic. The external perception of the overall situation must be scrutinized just as strictly as the local custom and the appropriateness of the benefit.

Special care must be taken with public officials (employer regulation) and in the healthcare sector. Depending on the legal system, any kind of donations in business context may be prohibited or may require registration in a transparency register.

### Example

Ms. Dr. Muster celebrates her 43rd birthday. A birthday is not considered a special occasion under the relevant guidelines, such as a 30-year service anniversary. A card is permitted but not a gift.

### Contact

Compliance







## Proper Accounting

We want to be perceived by our stakeholders as a trustworthy company and to meet the requirements of the supervisory authorities. Therefore, there must be no doubt about the accuracy and correctness of our accounting as well as our financial and non-financial reporting.

The company undertakes to record all business transactions in accordance with the principles of proper accounting. We ensure that the business documents and data we create are accurate, timely, complete and traceable. We observe retention and deletion periods and report any irregularities in connection with business documents.

### Example

Your department has exceeded its budget. You are considering allocating the procurement of important work equipment to another department that has not yet exhausted its budget. Please refrain from doing so. Manipulating financial records is strictly prohibited.. Such behavior can result in civil and criminal liability risks for the company and the employees involved.

### Contact

Finance Department  
Compliance

## Money Laundering

The prevention of money laundering is of the utmost importance to our company. Money laundering refers to activities in which illegally acquired funds are introduced into the legal economic cycle in order to conceal their origin. We are committed to ensuring that our business activities are not used for illegal purposes or for the financing of international terrorism. We therefore take risk-appropriate precautions in accordance with the legal provisions and the requirements of the supervisory authorities and report suspected cases of money laundering immediately.

### Example

You are responsible for the purchasing of a new vehicle for the fleet. The car dealer insists on payment in cash. Do not comply with the car dealer's request. We do not engage in any cash or black money transactions.

### Contact

Finance Department  
Compliance





## Conflicts of Interest

Henke Sass Wolf strives for sustainable business relationships with its customers and business partners that are mutually beneficial. Every employee must therefore ensure that the interests of our customers are taken into account in a fair manner. The interests of customers or business partners must not be prioritized to the detriment of other customers.

Furthermore, there are potential conflicts of interest if the private interests of an employee collide with the interests of HSW. We make decisions in the interests of HSW on the basis of objective decision-making. Even the appearance of a personal conflict of interest damages the company's reputation.

The following applies as a matter of principle:

Secondary employment is not permitted if it impairs the time scope of employment contract duties or the competitive interests of HSW.

Secondary employment must be disclosed in advance to the respective supervisor and the HR department. No financial interests in companies that may be affected by professional decisions of the employee or HSW (except for publicly listed companies).

Wherever possible, no direct reporting lines between children, parents, spouses or life partners.

No assumption of roles with entrepreneurial responsibility (e.g. board member, managing director, board of directors, supervisory board, advisory board) with customers, business partners or competitors.

## Example

You are asked to check offers from several suppliers for the procurement of aluminum. You are aware that your brother-in-law sells aluminum on a commercial scale and would be suitable for this. Do not conceal any information about an existing or possible conflict of interest. Speak openly with your superior or your team about the situation and hand over the decision-making process if necessary.

## Contact

HR Department  
Compliance

## IV. Responsibility towards Society and the Environment





## Human Rights

All people must be treated with respect and dignity.

Everyone is entitled to the rights and freedoms set out in the Universal Declaration of Human Rights (UN). We respect, protect and promote the applicable regulations for the protection of human and children's rights worldwide as fundamental and universally valid standards, as well as the right to freedom of association and adherence to working time standards. We firmly reject the use of child, forced and compulsory labor as well as any form of modern slavery and human trafficking.

These principles apply both within our company-group and along our entire supply chain.

### Example

You suspect that a supplier is employing 11-year-old children in raw material extraction. Although local law in the relevant country permits wage labor from the age of 10, we align ourselves with international human rights standards, specifically the guidelines of the International Labour Organization (ILO). According to these standards, the minimum permissible age for light work is 13 years, for general work 15 years, and for hazardous work 18 years.

Should the suspicion be confirmed, the cooperation with the supplier must be terminated immediately. Business relationships may only be established with suppliers who can reliably ensure that child labor is excluded.

### Contact

Human Rights Officers

## Environmental Protection

Our business strategies are geared toward environmentally responsible actions and sustainable development. We therefore comply with all relevant environmental laws and regulations, in particular we obtain the necessary permits, licenses and notifications and observe legal restrictions in order to minimize our environmental impact. We also strive to meet voluntary environmental standards and support the UN Sustainable Development Goals, such as combating climate change and ensuring sustainable consumption and production.

The environmental sustainability, durability and efficiency of our products are just as important to us as the careful and appropriate use of resources and energy.

### Example

Every employee can contribute to improving our environmental footprint. Make sure that lights and electronic devices in the office are turned off and heaters are turned down when leaving the office.

If you are unsure about the correct labeling or declaration of waste products, please contact the responsible Waste Management Officer. The officer will verify whether environmental regulations are being followed.

### Conatct

Immission Control Officer  
Water Protection Officer  
Waste Management Officer  
Hazardous Substances Officer  
Energy Management Officer  
Sustainability Officer



## V. Whistleblower System / Speak Up

Our whistleblower system provides a secure and confidential channel for employees, suppliers, customers and other stakeholders to report concerns or violations at Henke Sass Wolf that arise in a professional context. This system allows reports to be submitted and ensures that they are properly investigated.

The identity of the whistleblower and the person named in the report is protected. All incoming reports are treated in strict confidence. We protect whistleblowers from any form of harassment, discrimination or retaliation. Any attempt to harass or punish a whistleblower will be considered a serious breach of our Code of Conduct and may result in disciplinary action against the individuals concerned.

The internal reporting office is responsible for investigating reports from whistleblowers and will take appropriate action to remedy any violations discovered and take the necessary steps to improve our compliance system.

Reporting concerns or breaches is an important contribution to maintaining our integrity and legal compliance. We encourage all employees and stakeholders to report suspected cases to ensure that our company operates in accordance with legal and international standards.

**Ombudsperson**  
Anna-Lena Glander  
[a.glander@heuking.de](mailto:a.glander@heuking.de)  
+ 49 211 600 55-336

**Internal reporting office**  
[Compliance@henkesasswolf.de](mailto:Compliance@henkesasswolf.de)



## VI. Commitment

This Code of Conduct is binding for all employees of Henke Sass Wolf and its affiliated companies worldwide. Decisions should always be based on the applicable local laws and regulations. Violations of the Code of Conduct may result in significant reputational damage and legal consequences for Henke Sass Wolf, including fines, criminal proceedings or restrictions on regulatory approvals. Therefore, breaches of the Code of Conduct may lead to disciplinary action under labor law.

This Code also applies, within the framework of applicable legal provisions, when we engage third parties to design or carry out activities covered by this Code on our behalf. We will carefully select and assess such third parties, appropriately inform them of their obligations under this Code and require their written commitment to compliance.. These third parties are also expected to take appropriate measures to ensure that other natural or legal persons with whom they cooperate observe the minimum standards set out in this Code. We will strive to ensure that our affiliated companies comply with the obligations outlined in this Code. Any conduct contrary to these principles may result in the termination of the business relationship.

### **The Code of Conduct applies from December 14, 2023.**

This Code of Conduct is reviewed regularly and updated as required.

Upon publication of this edition, the new version enters into force and supersedes all previous versions.

(Current version 2.0 – effective as of May 20, 2025)