

CODE OF CONDUCT

for Business Partners



Preamble

Compliance with the law is a self-evident, inherently essential, and serves as the foundation for our actions. In this regard, we adhere to internationally recognized standards, such as the United Nations Universal Declaration of Human Rights (1948) („UN Universal Declaration of Human Rights“), the Declaration of the International Labour Organization („ILO“) on fundamental principles and rights at work (1998) („ILO Declaration on Fundamental Principles and Rights at Work“), the United Nations Global Compact, the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises. This adherence is in accordance with both national laws and practices.

The va-Q-tec Group is committed to its responsibility towards its customers, employees, investors, the public, and the environment. This responsibility includes compliance with applicable laws, adherence to ethical values, and sustainable action. Va-Q-tec is dedicated to minimizing its ecological footprint, creating a safe, inclusive, and committed working environment, and pursuing transparent and compliant business practices.

We uphold principles of open and fair competition and refrain from engaging in unethical practices to gain competitive advantages.

We expect all our business partners to conduct themselves responsibly and adhere to the standards set out in this Code of Conduct, which establishes the minimum expectations for business relationships with the va-Q-tec Group.

Business partners specifically include customers, cooperation partners, subcontractors, suppliers, commercial agents, consultants, and authorized dealers, along with their respective employees.



1. Compliance with Laws

Compliance with applicable laws, regulations, decrees, equivalent rules, and contractual agreements, as well as adherence to the principles and requirements defined herein, is mandatory for va-Q-tec, its employees, and all va-Q-tec business partners. Violations may result in significant damage, carry serious consequences, and are not tolerated by va-Q-tec under any circumstances. Constant mindfulness and awareness of these rules and regulations are required at all times.



2. Fundamental Rights and Human Dignity

We, along with our business partners, are committed to complying with, promoting, and protecting human rights. It is imperative that the dignity, privacy, and personal rights of each individual are respected.

Mutual respect is not only a prerequisite for our company's success but also a mandatory requirement for human interaction.

Any form of discrimination, whether based on gender, appearance, age, origin, skin color, nationality, disability, sexual orientation, political beliefs, or religious beliefs, or any other belief or worldview, is not tolerated.

Unacceptable treatment of employees, such as psychological violence or sexual and personal harassment, is strictly prohibited.

va-Q-tec is dedicated to fostering diversity, equality, and inclusion. Compliance with applicable regulations regarding minimum wages is mandatory. Wage or salary deductions may not be used as a disciplinary measure. Working hours and rest periods must at least comply with the respective legal requirements.

Our business partners are always expected to ensure compliance.



3. Slavery, Forced and Child Labour

va-Q-tec unequivocally rejects any form of forced labor, slavery, or similar practices. No employee may be directly or indirectly coerced into employment through intimidation, violence, or any other form of coercion. Every employee has the right to terminate their employment at any time, provided they observe contractual obligations, collective bargaining agreements, or statutory notice periods.

Additionally, any form of child labor is strictly prohibited. The legal regulations applicable in the respective country, or at a minimum, the provisions of the International Labour Organization (ILO) Convention No. 138 concerning the minimum age for employment and the prohibition of child labor are to be observed.

Local legal regulations must be followed; however, at a minimum, the regulations set forth by the ILO Convention No. 138 regarding the minimum age for employment and the prohibition of child labor are to be observed.

We also require our business partners to comply with these standards.



4. Social Standards and Fair Working Conditions

va-Q-tec is committed to its social responsibility and upholds relevant social standards. Specifically, regulations concerning working hours, compensation, and leave entitlements are established at a minimum in accordance with applicable national laws and legislation.

Employees are entitled to join a union and form associations. This principle extends to our business partners as well.



5. Health and Safety

Ensuring safe and health-compatible working conditions is a primary objective. To prevent health hazards, occupational health and safety regulations must be strictly observed, a requirement that extends to our business partners as well.



6. Conduct towards Business Partners

va-Q-tec is dedicated to treating business partners with fairness and respect in all aspects of our daily operations. Quality and customer satisfaction are of paramount importance at va-Q-tec. We honor our contracts and, in the event of a conflict, prioritize communication and mediation as our primary resolution methods. We hold the same expectations for our business partners.



7. Free Competition

va-Q-tec and its business partners consistently adhere to applicable antitrust laws. Specifically, we do not enter into any anti-competitive agreements with competitors, suppliers, or customers.



8. Confidentiality and Data Protection, Intellectual Property

Compliance with the relevant legal requirements for data protection is guaranteed.

Business partners are required to respect the know-how, patents, trade, and business secrets of va-Q-tec and third parties. They must not disclose this information to third parties without the express prior written consent of va-Q-tec, nor in any other unauthorized manner.



9. Environment and Resources

We are collectively committed to the responsible management of risks, resources, and the environment. Therefore, we advocate for sustainable management of resources. Furthermore, we endeavor to minimize environmental impacts and to continuously enhance our environmental protection efforts. We expect the same level of commitment from our business partners.



10. Gifts and Gratuities

Both we and our business partners refrain from accepting or offering any inappropriate gifts or benefits. In this process, we strictly adhere to national regulations.



11. Bribery and Corruption

We, along with our business partners, do not tolerate any form of corruption or bribery. No employee is permitted to use their position or function to obtain personal benefits for themselves in a manner that is unfair or contrary to legal provisions, especially not to demand, be promised, or accept such benefits. It is crucial to avoid even the appearance of corrupt behavior. The applicable anti-corruption laws must be strictly followed.



12. Avoiding Conflicts of Interest

The decisions of va-Q-tec's business partners are made solely based on factual criteria, with financial or personal interests or relationships having no influence on this process.



13. Prevention of Money Laundering and Financing Terrorism

va-Q-tec is dedicated to preventing and combating money laundering and the financing of terrorism. Our business partners are also committed to adhering to all laws and regulations related to the prevention of money laundering and the prohibition of supporting and financing terrorist activities.



14. Export Control

Through appropriate measures, we ensure that transactions involving third parties comply with economic embargoes, sanctions lists, and trade, import, and export control regulations. Our business partners also ensure that they, as well as their own business partners, legal representatives, and subcontractors, are not listed as a 'Denied Party' on any applicable sanctions list.



15. Responsible Sourcing of Materials

Our business partners adhere to all applicable laws and the obligations arising from them regarding the sourcing of minerals, particularly those originating from conflict regions and high-risk areas.



16. Supply Chain Compliance

Business partners are required to comply with the principles and requirements of this Code of Conduct and to contractually obligate their own business partners to adhere to corresponding standards. Furthermore, they must ensure that all employees also comply with these standards.



17. Audits

va-Q-tec, and third parties authorized by va-Q-tec, are entitled to conduct on-site audits at business partners' premises following prior notification, to verify compliance with the provisions of this Code of Conduct.

Additionally, our business partners are required to participate in self-assessments on platforms specified by va-Q-tec, as requested.

Should there be any deviations from the defined objectives, business partners are to identify improvement measures, implement them, and regularly monitor their effectiveness.



18. Violations, Reporting of Irregularities

Any violation of the requirements outlined in this Code of Conduct will be considered a significant breach of contract. In the event of such a breach, the business partner is required to immediately demonstrate that efforts have been made to mitigate the effects of the breach and to rectify the situation.

Furthermore, notwithstanding any other contractual remedies available to va-Q-tec, any violation of a requirement set forth in this Code of Conduct grants va-Q-tec the right to terminate the business relationship, including all related contracts, with immediate effect.

We encourage our business partners to report any breaches of this Code of Conduct to the following address: **compliance@va-Q-tec.com**

Würzburg, August 25, 2023

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