

Code of Conduct

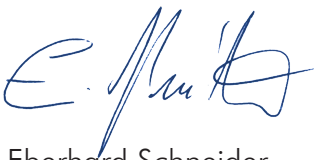


Dear colleagues,

The MCV Group takes its ecological and social responsibilities very seriously. Compliance with human rights and fair working conditions are an integral part of our corporate culture.

The management of MCV Group signed this Code of Conduct in October 2022. It acknowledges the ten principles of the United Nations' Global Compact and aims at compliance with legal requirements. The applicable laws provide the binding framework for the MCV Group's wide-ranging business activities around the world.

This Code of Conduct is designed to highlight the range and focus of relevant legal requirements for the MCV Group and to emphasize the binding nature of those requirements. The principles set out in this document apply to dealings with colleagues, customers, suppliers, business partners and public bodies alike.



Eberhard Schneider
CEO of MCV Group



General principles

Integrity, credibility, transparency

MedCare Visions® GmbH aligns its business actions and decisions with the generally applicable ethical values, in particular integrity, credibility and respect for human dignity. It promotes transparency, responsible management and control in the company in an appropriate manner.

Scope

The Code of Conduct represents binding rules that must be observed by every employee of the company. In particular, the members of the management board and all executives are responsible for actively implementing this Code of Conduct. They must act as role models in every respect. The Code is the basis and guideline for dealing with ethical and legal challenges in daily work. Every employee can contact his or her supervisor or the managing directors with questions and comments in this context.

Supply chain

The company expects its suppliers to observe the guiding values of the Code of Conduct, supports them in this to the best of its ability and encourages them to do the same in their supply chains.

Compliance with the law

The company observes the laws and other legal regulations of the countries in which it operates. This expressly also applies to the provisions of national, European and international chemicals law as well as to embargo, customs and export control regulations.

Conduct towards competitors, business partners and third parties

Competition and antitrust law

The company respects the rules of fair and open competition and does not enter into any agreements that influence competition in an improper manner.

Employees of the company are obliged to comply with the rules of fair competition. In particular, any agreement or concerted practice with competitors on the following topics is prohibited:

- Prices and price components
- Conditions
- Customers
- Delivery areas
- Quotas and capacities
- Agreed market withdrawals
- Voting on planned innovations
- Boycotts

Tenders

If the award of a contract is made on the basis of a formal invitation to tender, the company will neither consult nor coordinate offers with other bidders. This applies to both public and restricted tenders and irrespective of whether the contract is awarded by the public sector or by a private entity.

Corruption

The company expressly opposes any form of corruption at home or abroad and avoids even the appearance of trying to influence business decisions through unfair business practices. No employee may exploit the company's business connections for his or her own benefit or to the detriment of others. In particular, this means that no employee may grant or accept unauthorized private benefits (e.g. money, material assets, services) in business dealings that are likely to influence a proper decision. Every employee of the company is obliged to seek advice or assistance in the event of suspicions or legal doubts regarding the existence of corruption or white-collar crime. Advice or assistance is provided by the ESG-Responsible and/or the managing directors.

Granting and acceptance of benefits, invitations and gifts

Invitations, such as to business meals or events, which are in accordance with recognized business practices and appropriate, may be extended or accepted if they do not serve the purpose of undue favoritism. The same applies to the acceptance or giving of gifts. If there is any doubt as to the existence of an objective reason or the customary nature of a gift, the employee must first ask the ESG-Responsible or a managing director. This point is additionally regulated internally in a comprehensive and meaningful manner.

Public officials

Benefits of any kind to civil servants and other public officials as well as to agents of state institutions, even indirectly via third parties, are prohibited, regardless of their value.

Parties and elected officials

In the case of donations to political parties and political organizations, as well as to elected officials and candidates for political office, the applicable laws are observed.

Consultants and agents

The engagement of consultants, agents and other contract intermediaries may not be used to circumvent the prohibition of bribery.

Donations and sponsoring

Donations are made only on a voluntary basis and without any expectation of consideration in return. Donations and sponsorships must not be designed to covertly promote decisions in the interests of the company. The donation must be transparent. The recipient of the donation and the specific use by the recipient must be known. It must be possible to account for the reason for the donation and the intended use at any time. Remuneration similar to donations must be avoided. Donation-like remunerations are benefits which only appear to be granted as remuneration for a service, but whose value clearly exceeds the value of the service.

Money laundering

The Company does not tolerate money laundering. All employees are required to strictly comply with anti-money laundering laws. They must also immediately report any suspicious forms of payment or other transactions that may indicate money laundering to the ESG-Responsible or a manager.

Tax law / customs law / foreign trade law

The company truthfully prepares tax returns and declarations. All goods subject to customs duties are properly cleared by the company. The company consistently complies with the legal requirements for export control and customs in the subject areas of foreign trade and customs law and ensures their proper implementation. The company expects from its suppliers a qualified and timely provision of export control and foreign trade data as well as the implementation of sufficient standards for security in the supply chain within the framework of global customs security programs.

Avoidance of conflicts of interest

Loyalty of employees

The company expects loyalty from its employees. It takes care that its employees do not get into situations where their personal or financial interests conflict with those of the company or its business partners. The Company's employees shall immediately report any personal interest that may exist in connection with their work to their supervisors.

Secondary activities and shareholdings

Employees of the Company are prohibited from managing or working for a company that competes with the Company. This also applies to the participation of a close relative or life partner.

Dealing with information

Trade and business secrets

The employees of the company are obliged to maintain secrecy about company and business secrets and other internal matters. This applies accordingly to information about contractual partners and customers that is not publicly accessible. The obligation to maintain confidentiality shall continue to apply after termination of the employment relationship.

Privacy

In addition to the general confidentiality provisions (e.g. Section 17 UWG), data secrecy must be observed in accordance with DSGVO. In particular, it is prohibited to process, disclose, make accessible or otherwise use protected personal data without authorization for a purpose other than that which is part of the respective lawful performance of duties. This obligation to maintain data secrecy shall continue to apply even after the employee leaves the company.

Truthfulness

All reports and other written documentation must be correct and truthful. This applies regardless of whether they are internal reports or are given externally. Data collection and other records must be based on the principles of proper accounting and must always be complete and correct.

Principles of social and environmental responsibility

Social responsibility

Social responsibility is an indispensable component of value-based corporate management and an essential factor for sustainable corporate success.

Human Rights

The company respects and supports internationally recognized human rights. In this context, we are also in constant dialog with our suppliers to avoid that our products contain raw materials from conflict regions.

Child labor

The prohibitions on child labor and forced labor in any form are observed.

Prohibition of discrimination

Discrimination against employees and third parties will not be tolerated. The company strongly opposes unacceptable treatment of employees, in particular sexual or verbal harassment.

Equal opportunities

The company promotes equal opportunities for its employees.

Employee rights

The employees' freedom of assembly and association is recognized to the extent legally permissible under national regulations. The company observes the applicable national laws and labor standards with regard to appropriate remuneration and maximum working hours. This naturally also includes compliance with all provisions of the law regulating a general minimum wage in Germany. The company ensures fair working conditions overall.

Occupational safety and health protection

Occupational safety and health protection in the workplace is ensured within the framework of national regulations.

Environmental and climate protection

Sustainable environmental and climate protection and resource efficiency are important corporate goals for us. Both in the development of new products and services and in the operation of production facilities, we ensure that any resulting impact on the environment and climate is kept as low as possible and that our products make a positive contribution to environmental and climate protection for our customers. Each employee is responsible for conserving natural resources and contributing to the protection of the environment and climate through his or her individual behavior.

Consumer interests

Insofar as consumer interests are affected, the company complies with the regulations for the protection of consumers.

Social commitment

The company contributes to the social and economic development of the country and region in which it operates.

Compliance with the Code of Conduct

Communication

The company familiarizes its employees with the contents regulated in this Code of Conduct and explains the obligations arising from it. The company communicates the principles of the Code of Conduct to its business partners.

Policies and processes

The behavioral requirements set out in this Code of Conduct are binding on the company's employees as part of their employment contract and must therefore be complied with. The company shall take all necessary steps to implement the basic values and requirements contained in this Code of Conduct through suitable organizational measures and appropriate policies and processes in all business areas.

Regular controls

The Company undertakes to monitor compliance with the Code on a regular basis.

Notification of violations

Every employee of the company is required to immediately report any (potential, including threatened) violations of laws, internal regulations and this Code of Conduct that he or she observes to the ESG-Responsible or a Managing Director. Reports of a violation of this Code will be treated in strict confidence and will not have any negative consequences for the reporting employee, unless an untrue fact was deliberately alleged.

Consequences of violations

Violations of the Code of Conduct and legal provisions may, depending on their severity, result in consequences under employment and liability law and may also lead to criminal sanctions.

IMPRESSUM

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