

SUPPLIER CODE OF CONDUCT



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Preamble

CompuGroup Medical SE & Co. KGaA and its subsidiaries worldwide (CGM) are committed to socially responsible practices and will continuously achieve their goals through ethical action. As a clear commitment to our human rights, environmental and social responsibility, our Code of Ethics, published on our [website](#), constitutes the specific requirements for responsible business practices and personal conduct. In addition, with this Supplier Code of Conduct we strive to underline the special responsibility of those involved in the procurement process and ensure all involved parties act in accordance with our principles in the respective procurement markets.

The ethical guidelines laid out in this Supplier Code of Conduct are based on the principles of the UN Global Compact, the International Labor Organization (ILO) conventions, the German Supply Chain Act, the Universal Declaration of Human Rights of the United Nations (UDHR), the UN Conventions on the Rights of the Child (CRC) and the Elimination of All Forms of Discrimination against Women (CEDAW), and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

As per environmental obligations, the supplier adheres to the Minamata Convention and shall not manufacture products containing mercury or mercury compounds. It also supports the ban on the production and use of chemicals under the Stockholm Convention on Persistent Organic Pollutants (POPs Convention), as well as the environmentally unfriendly handling, collection, storage, and disposal of waste. The guidelines of the Basel Convention which regulates the transboundary movements of hazardous wastes and other wastes are also to be duly upheld.

We regard the statements mentioned in this document as minimum standards to be observed by the supplier. This Supplier Code of Conduct forms the basis for all our business relationships. Consequently, compliance with the expectations stated herein is mandatory for all suppliers and is to be confirmed by signature.

We attempt to use gender-neutral wording in this document. Furthermore, we use the generic masculine to aim for clear and simple language, except in those instances where gender-neutral wording is used. All personal references apply equally to all genders.

Our values

Our Corporate Values serve as basis and guide for fulfilling our [vision](#). Specifically, our **values “Act with integrity and respect!”** and **“Collaborate and take ownership!”** especially emphasize our understanding of how we embody the relevant legal conditions and ethical principles.

Our responsibility in business activities

Fair competition

The supplier is committed to the free market and fair competition. For this reason, the supplier shall not tolerate antitrust violations and its employees always act responsibly, fair, and in accordance with the national and international competition regulations, guidelines, and laws.

Corruption and bribery

The supplier speaks out clearly against all forms of corruption and bribery and supports efforts to combat them in all their forms. Consequently, any offering, promising, or granting of benefits of any kind by its employees to induce favorable action on the part of a third-party (active corruption) is strictly prohibited. Furthermore, the supplier shall not accept offers, gifts, promises or other benefits if this can create the appearance that business decisions are being influenced by other factors (passive corruption).

Our responsibility in handling business information

Intellectual property

The supplier respects and protects intellectual property rights. When technology and know-how are transferred, intellectual property rights and customer information are rigorously protected.

Data protection

The supplier guarantees the protection of all personal data of clients, customers, employees, etc. The applicable laws and regulations when collecting, storing, processing, and passing on data shall always be abided by.

Our social responsibility

Diversity and equal opportunities

The supplier complies with applicable legal requirements on the protection of employee rights.

The supplier promotes diversity, inclusion, and equal opportunities within its organization, and furthermore stands for a working environment characterized by respect and tolerance. Bullying, abuse of power, intimidation, threats, and other forms of harassment shall not be tolerated.

The supplier rejects any form of discrimination. This includes any kind of unequal treatment, rejection or preference based on gender, age, disability, sexual orientation, religious affiliation, political opinion, national or ethnic origin and all other circumstances that may lead to a violation of the principle of equality.

Human rights

The supplier respects human rights, personal rights, and the dignity of its employees and all third parties. Forced labor, child labor, slavery, and human trafficking as well as any form of exploitation shall not be tolerated. Strict compliance with the applicable and relevant laws is essential. The supplier is required to respect the ILO conventions on the minimum age of employment such that children below the age of completion of compulsory education shall not be employed. Even if the employment of younger children is permitted under local regulations, the supplier shall under no circumstances employ children under the age of 15. As for work that is likely to harm the health, safety or morals of children, the minimum age shall not be less than 18 years of age.

Thus, within the supplier organization's sphere of influence, human rights are promoted and protected in accordance with the Universal Declaration of Human Rights. Likewise, the International Labor Organization Declaration on Fundamental Principles and Rights at Work are abided by in line with the applicable laws and practices.

Responsible pay and working hours

The supplier commits to paying its staff a living wage. It also ensures that the respective national and collectively agreed maximum working hours are not exceeded.

Right to freedom of association

The supplier's employees have the right, in accordance with the applicable laws and regulations, to unite in trade unions, elect employee representatives or form a works council, and to join any of the mentioned institutions or organize themselves as they see fit.

Employee health and occupational safety

The supplier pays close and thoughtful attention to the mental and physical well-being of its employees and there is a goal-oriented set of preventive and precautionary measures. These include appropriate safety measures to effectively protect employees against accidents, potential hazards, and occupational diseases, as well as employee trainings and personal protective equipment. Workers are provided with access to drinking water in sufficient quantities as well as access to clean sanitary facilities.

Conflict and security

The supplier only commissions private or public security staff to protect a project or site if these have been adequately trained and duly respect the prohibition of torture and inhumane or degrading treatment, as well as recognize the right of employees to freedom of association.

Environment and climate

Protecting the environment and the climate forms an essential part of corporate responsibility. The supplier complies with all applicable environmental regulations and procures and uses resources such as energy and water responsibly.

The supplier organizes its business in a way that minimizes impacts on the environment. Furthermore, any such environmental impacts shall be controlled, measured, and documented. The supplier shall source and use natural resources such as energy and water responsibly, shall strive to reduce the environmental impact of its business activities, and shall work to improve the quality of air, water, soil, and biodiversity. Suppliers ensure that the management of waste from their operations comply with the requirements of the applicable government regulations and international agreements.

The supplier furthermore commits to continuous improvement activities that aim to reduce greenhouse gas emissions and its carbon footprint, thereby mitigating the harmful effects of climate change.

Conservation of natural resources

The supplier does not carry out forced evictions nor deprive any person of land, forests, or water such that the security of livelihoods is threatened, and people's legitimate rights are violated. In addition, the supplier shall refrain from all activities that contribute to adverse soil alterations, water and air contamination, and excessive water use if this harms people's health, significantly impairs the natural basis for the production of food or hinders people's access to safe water and sanitation.

Implementation of the requirements

We expect our suppliers to identify risks within their supply chains and take appropriate (prevention) measures. In the event of suspected violations, the supplier shall promptly inform CGM.

If the supplier violates this Supplier Code of Conduct, it will have the opportunity to adapt its activities to the expectations and standards of this document within a period jointly agreed on between the parties and to provide CGM with adequate evidence to verify the effectiveness of the measures. If corrective actions are not possible within the specified time, CGM shall be presented with an action plan, including deadlines and responsibilities, towards eliminating the violations. If the supplier does not comply with these requests, CGM reserves the right to take measures, which may include the termination of the business relationship.

For further questions or concerns regarding the Supplier Code of Conduct, Group Procurement can be contacted as follows: vendor.masterdata@cgm.com.

Thank you for your efforts.



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