

HARTMANN



The Compliance- **Heroes** of HARTMANN

Code of Conduct
4th edition



HARTMANN –
our Mission, our Values, our Code of Conduct.

HARTMANN is going further for health –
compliant behaviour ensures we do it the right way.

Dear Readers,

The HARTMANN GROUP is a leading international supplier of medical and hygiene products. Our employees take a holistic view on healthcare and focus on the direct benefits for patients and professionals. Our aim is to meet the increasing challenges of the healthcare industry and improve the quality of life for as many people as possible. We are proud of this, and even after more than 200 years, are constantly looking for new, innovative solutions and continuous improvement.

Cooperation and a culture of open exchange within the group are the basis for our daily work and success. We are successful when we enjoy the trust of all interest groups, e.g. patients, healthcare professionals, associations, regulatory authorities, journalists and investors. In order to strengthen this trust in the long term, all employees and business partners of the HARTMANN GROUP are committed to the highest standards of integrity and ethics.

Due to the diversity of our products and the global orientation of the HARTMANN GROUP, it is necessary to consider the international requirements for the group as a whole and for each country organization as well. In addition to the legal requirements, ethical principles and our social responsibility as a company are crucial.

These central ideas are part of our Code of Conduct. It reflects what the HARTMANN GROUP expects from you as an employee, customer, supplier or business partner, while at the same time outlining our mission, values and obligations. It defines how these are to be applied in practice and provides important guidance.

If you have any questions about compliance - even if they may seem trivial - you should seek advice and help. You can contact your supervisor or your Local Compliance Officer at any time. You will also find further contact persons in our Code of Conduct.

Our daily actions at the HARTMANN GROUP should always be in accordance with the requirements of the Code of Conduct.

Collectively, we will build upon your and our compliant behavior - to ensure we do it the right way.

Heidenheim, January 2019

A handwritten signature in blue ink that reads "Britta Fünfstück".

Britta Fünfstück
Chief Executive Officer
HARTMANN GROUP

Code of Conduct

Welcome to the HARTMANN
Code of Conduct

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01

Social Responsibility and Patient Satisfaction

Our concern for the common good is reflected in how we act as socially and ethically responsible individuals. We aim to support community and other programs that are committed to protect the environment, welfare and the social stability of our community and the countries in which we operate.

As a manufacturer and distributor of medical devices, related solutions and services, we contribute towards improving the health and satisfaction of patients. We dedicate ourselves to safe and high quality products.

We are committed to full transparency, integrity and ethical conduct in our relations with patients, members of the health professions and public authorities. Our actions are based on the local, national and international laws in each HARTMANN GROUP country, especially on the following laws and documents:

- The Universal Declaration of Human Rights by the United Nations (UN)
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- Fundamental Conventions by ILO (i.e. "Core Conventions")
- The UN Convention on the Rights of the Child

Following the principles above, we apply the guidance from the UN Global Compact and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

We believe in our products and services and pride ourselves in proper conduct within the medical and scientific community.



RESPECTFUL

A man with dark hair and a slight smile, wearing a light blue button-down shirt and a grey-blue textured blazer, is holding a large, bright green piggy bank. The piggy bank is pig-shaped with small black eyes and a snout. The background is a dark teal color with some geometric light patterns.

RESPONSIBLE

We strive to do our best to achieve sustainable growth and a fair profit on both current and future operations. We always deal with the assets of the company in a responsible way.

Relationship with our Employees

As a global business the staff at HARTMANN observe and comply with the relevant employment laws in each jurisdiction in which we operate. The work, ingenuity, commitment and entrepreneurship of our employees are amongst our greatest assets.

Our employees are the driving force behind our high quality products, patient satisfaction and our overall corporate vision.

The essential basis for successful and productive work is a good working environment. The way in which we deal with each other as colleagues and fellow employees is reflected within our company culture. We will maintain a secure work environment and strengthen the skills and expertise of our employees, in order to achieve best possible performance for the benefit of all our stakeholders.

We respect our employees' human rights, individuality and differences, promote diversity in the workplace and provide a safe and rewarding work environment. This means that we will not tolerate harassment or discrimination under any circumstances and fully support equal opportunities and fair pay.

A woman with long, straight black hair and bangs is smiling warmly at the camera. She is wearing a black, long-sleeved button-down shirt. She is holding a large, solid pink heart shape with both hands in front of her chest. The background is a soft, muted purple with subtle geometric patterns.

CARING

A man in a dark suit, a light-colored shirt, and a patterned tie is wearing a black top hat. He is holding a magnifying glass over his right eye, which is significantly enlarged and detailed. The background is a plain, light green wall.

COMPLIANT

04

Compliance with Medical Device Laws and Other Regulations

As a manufacturer of medical devices and pharmaceutical products (amongst others) we are subject to many national and international rules and regulations designed to protect patients, consumers and professional users.

We strive to constantly improve the quality of our products and related healthcare services. Our products are designed and manufactured to fully comply with our Quality Management System and meet the necessary official standards of the markets we serve.

In order to maintain the best possible safety standards of our products and in order to fulfil the regulatory requirements, we always ensure we meet all regulatory obligations and promptly take action should adverse events occur.

05

Compliance with Anti-Corruption Laws and Ethical Standards

We will conduct our business in compliance with all laws, rules, and regulations and in accordance with highest ethical standards possible.

We require strict compliance with all legal requirements, banning corruption and illicit payments of any kind. Any behaviour that could be interpreted as corruption, such as bribes, fraud, overpayments, or misuse of financing or other payments to public administrations will not be tolerated.

The majority of countries in which we operate have laws that forbid making, offering or promising any payment or anything of value (directly or indirectly) to a government official respectively healthcare professionals when the payment is intended to influence an official act or decision to award or retain business. We are subject to the anti-bribery and anti-corruption provisions of numerous legal provisions, such as the UK Bribery Act, the US Foreign Corrupt Practices Act (FCPA) and other national implementing laws and regulations.

These provisions are designed principally to prevent and punish all acts of corruption of domestic or foreign public officials respectively healthcare professionals. Therefore, all employees of the HARTMANN GROUP may offer gratuities and gifts to public officials respectively healthcare professionals, only in accordance with the defined HARTMANN rules and guidelines for cooperations with healthcare professionals.

The law also prohibits using intermediaries (for example, foreign affiliates, distributors, agents and consultants) to channel payments to public officials respectively healthcare professionals for the same purpose.





ETHICAL



PROFESSIONAL

Relationships with Healthcare Professionals

The team at HARTMANN build and maintain professional and objective relationships with the healthcare professionals with whom we deal. We work to ensure the professional integrity and objectivity of these important stakeholders is maintained at all times.

As a company producing and distributing medical devices and related services, we are subject to laws and regulations that prohibit undue payments and donations to individuals (clinical or non-clinical, including but not limited to, physicians, nurses, technicians and research coordinators) or entities (such as hospitals or group purchasing bodies) that directly or indirectly purchase, lease, recommend, use and arrange for the purchase or lease of, or prescribe our medical devices ("Healthcare Professionals"). Our policy is to fully comply with all such laws and regulations.

We strictly adhere to the relevant industry codes of conduct, for example the MedTech Europe Code of Ethical Business Practice, the BVMed Code Medical Devices (Kodex Medizinprodukte) and any other relevant code of ethical conduct, published by the respective local association, providing they do not contradict the aforementioned provisions. Relationships with healthcare professionals must be based upon the principles of separation, transparency, equivalence and documentation.

We have a legitimate interest to enter into agreements with healthcare professionals, i.e. medical institutions. All such interactions must have a clear medical or scientific related purpose and any payments must strictly follow a fair market value analysis in order to avoid any overpayment.

Compliance with Anti-Trust and Competition Laws

We believe in free competition and we respect that the proper functioning of the economy is based on fair and loyal exchange within the framework of open competition. We must ensure that we fully comply with the applicable competition laws. While these laws are complex and difficult to be summarised in this context, at a minimum, they prohibit agreements with competitors that affect prices, terms or conditions of sale, or fair competition.

Employees responsible for areas of the business where these laws apply must be aware of them and their implications, including how they apply in the country in which we operate.

We prohibit:

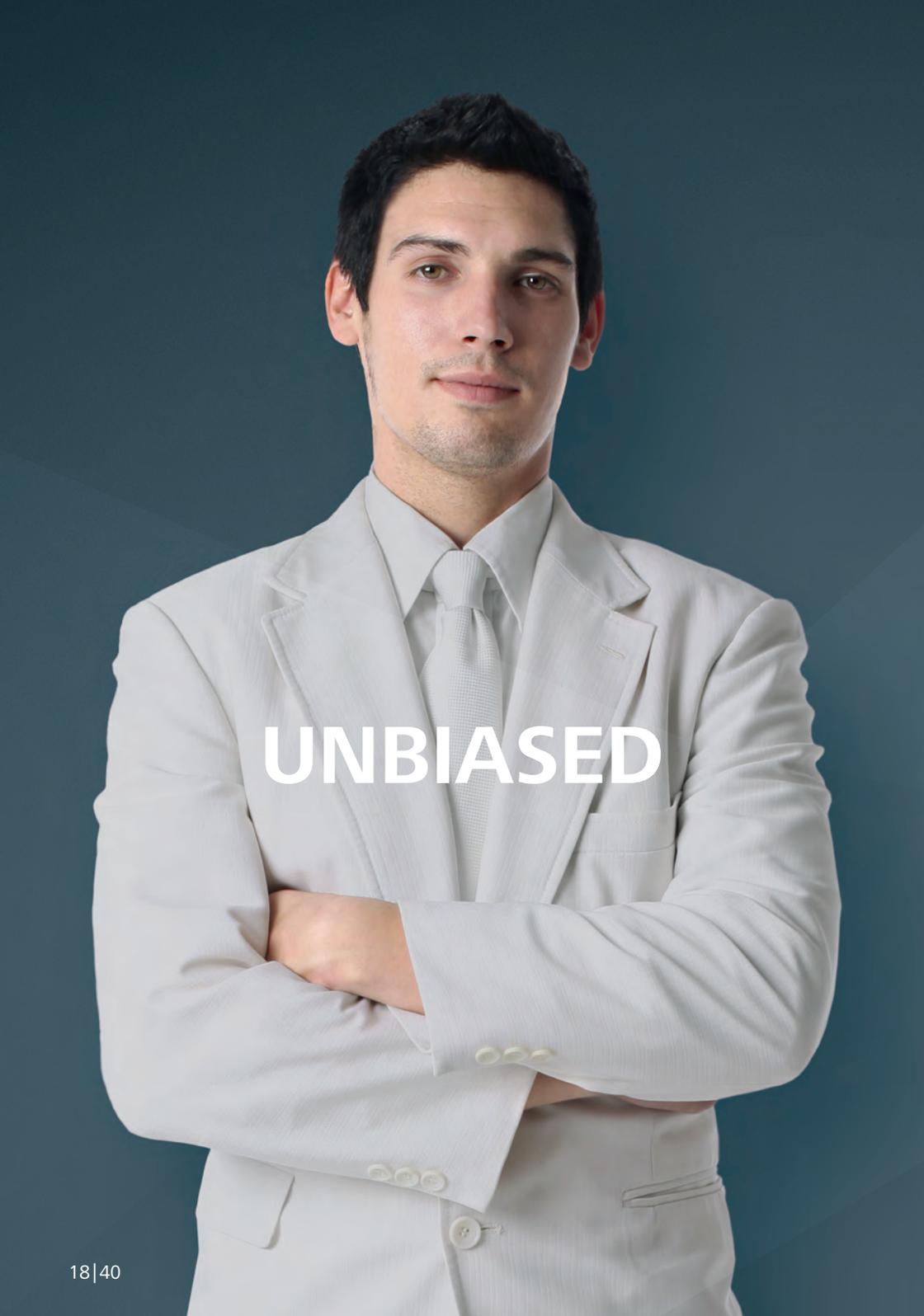
- Discussions or contacts with competitors about pricing, costs, or terms or conditions of sale.
- Discussions or contacts with suppliers and customers that unfairly restrict trade or exclude competitors from the marketplace.
- Agreements with competitors regarding allocating markets or customers.
- Agreements with others to boycott customers or suppliers.

Anti-competitive practices may lead to fines, civil liability for damages, exclusion from public contracts or criminal liability. These sanctions may significantly damage the company.

We are also subject to a number of particular medical device related advertising restrictions. It is our commitment to market and sell our products in accordance with the limitations on promotion of our products.



HONOURABLE

A man with dark hair and a light beard, wearing a white pinstriped suit, white shirt, and white tie. He has his arms crossed and is looking directly at the camera with a neutral expression. The background is a solid dark blue color.

UNBIASED

Political Parties

Political decisions affect HARTMANN and its business in many different ways. As a responsible member of society, the team at HARTMANN consider it as a duty and a right to participate in the political process and to explain our positions and perspectives. We do this by engaging in the work of industry trade associations.

We encourage our colleagues to participate in electoral politics. However, such activity must occur strictly on an individual or within a private capacity and not on behalf of the company. Colleagues may not conduct personal political activity on company time or use company property or equipment for this purpose.

Scientific Integrity

The development, validation and manufacturing of medical devices is highly dependent on clinical evaluation and studies.

We are committed to ensure that all study proposals are ethically and scientifically reviewed in accordance with applicable laws and regulations, as well as with applicable industry codes. We will strictly adhere to scientific methods and engineering principles. Our studies are designed and conducted without bias. For example, by suppressing, fabricating or falsifying data.

A woman with blonde hair, wearing black-rimmed glasses and a white lab coat, is looking down at a blue clipboard she is holding. She is holding a blue pen over the clipboard. The background is a plain, light-colored wall.

PRINCIPLED

A woman with voluminous, dark, curly hair is shown from the chest up. She is wearing a dark-colored blazer with thin, light-colored vertical stripes. She is holding a large, light-colored megaphone in front of her face, with the word "HONEST" printed in large, white, bold, sans-serif capital letters across its center. Her eyes are visible above the top edge of the megaphone, looking directly at the camera. The background is a light blue color with faint, geometric, overlapping shapes in a slightly darker shade of blue.

HONEST

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Conflict of Interest

A conflict of interest arises where personal, social, financial or political interests are placed before the interests of the company. Even the appearance of a conflict can damage the reputation of the company. However, many potential conflicts of interest can be resolved in a simple and mutually acceptable way.

Therefore, any potential conflict of interest must be disclosed and approved. Conflicts of interest may, for example, arise if an employee or his/her family member:

- Has a substantial financial interest in a HARTMANN supplier, competitor or customer.
- Has an interest in a transaction in which it is known that HARTMANN is, or may be, interested.
- Takes advantage of the corporate opportunities at HARTMANN for personal profit.
- Receives fees, commissions, services or other compensation from a HARTMANN supplier, competitor or customer.

Intellectual Property

We are active in a business environment that is driven by developing proprietary intellectual property and confidential information. Protecting our intellectual property is essential to maintaining the company's competitive advantage.

Our company protects its intellectual property by seeking patent, trademark, or trade secret protection. We protect our confidential information by taking precautions to prevent inappropriate disclosure or loss of such information.

We expect every employee to support the establishment, protection, maintenance and defence of intellectual property rights of the HARTMANN GROUP in the best possible and responsible way.

We exercise the same care and attention in protecting the intellectual property of HARTMANN, as we do in respecting the corresponding rights of third parties. Unauthorised use, theft, or mis-appropriation of third-party intellectual property may result in significant fines, lawsuits or criminal penalties for the company.



PROTECTIVE



TRUSTWORTHY

Privacy and Data Protection

The processing of personal data may constitute or be considered as a violation of privacy and individual liberties. Personal data protection gives individuals whose personal data is held the right to control the collection, processing, use, disclosure and storage of data relating to them.

As part of our business, we may obtain medical and other information about patients and other consumers who receive our products. This information can be contained in records obtained as part of a clinical study, patient device tracking records, vigilance records, records obtained while providing technical support or other records. We will treat all such records and information as strictly confidential, unless we are forced to disclose these by law or official directive. The privacy of personal information is protected by the following principles further laid down in the relevant data protection guideline of the HARTMANN GROUP:

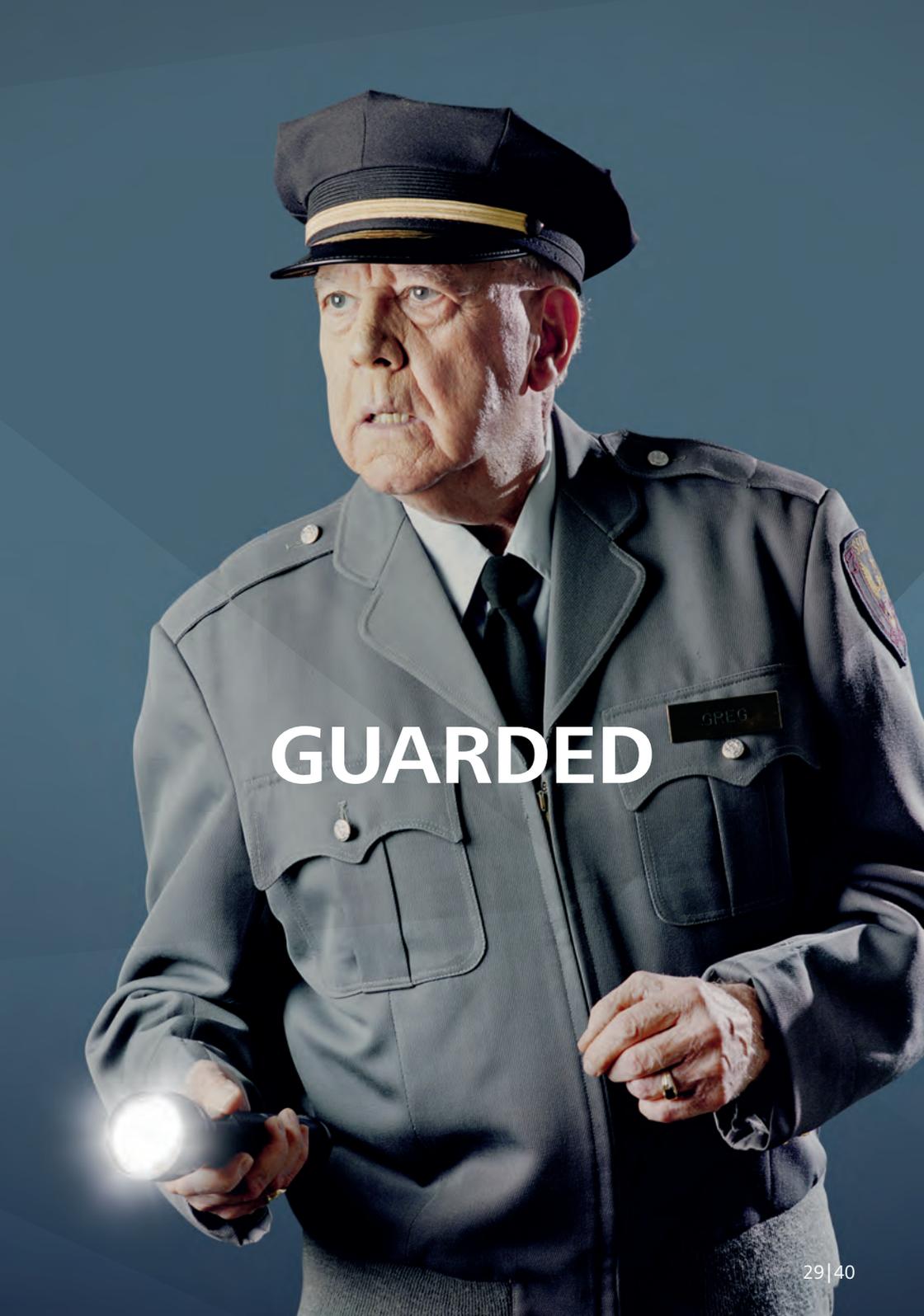
- Personal information must always be kept confidential, sensitive personal information always strictly confidential and only be used or disclosed in accordance with applicable laws and regulations and, when necessary, after giving notice or obtaining the individual's consent.
- Personal information may only be collected for legitimate business purposes and kept only as long as necessary.
- Adequate precautions to safeguard personal information must be taken.
- Personal information may only be shared with individuals who have a legitimate need for it and will protect it properly.
- Individuals whose personal data is held by the company are allowed to review and correct the information.

Information Security

HARTMANN has established an Information Security Management System and implemented appropriate technical and organisational security measures based on international standards to ensure the confidentiality, integrity and availability of information and data within the HARTMANN GROUP.

We handle all information and data according to their information classification and ensure that confidential and strictly confidential classified information, data and documents are always protected effectively from unauthorised access.

The HARTMANN information security principles are laid down in the effective Information Security Policy and the associated Information Security Processes.



GUARDED



MINDFUL

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Environmental Protection

We are committed to fulfil our corporate environmental responsibilities by pursuing our vision with a long-term and broader view that takes into account the needs and challenges of both, present and future generations.

We are committed to operate our businesses and production facilities in a manner that respects and protects human health and the environment. In particular, we are required to observe national and local regulations, e.g. on air emissions, water resources and waste disposals.

Trade and Tax Law

As a global manufacturer and distributor of healthcare products, we must fully comply with all applicable trade and tax laws as well as programs. The penalties for non-compliance are severe and can include damage to the reputation of the HARTMANN GROUP, fines, restrictions on our ability to import or export, and even criminal penalties. We will comply with the applicable trade and tax laws in all jurisdictions in which we operate.



LAWFUL

A man with dark hair and a beard, wearing a dark suit jacket, a white shirt, and a purple patterned tie. He is looking upwards and to the right with a thoughtful expression, his right hand resting against his chin. The background is a solid light green color.

IMPARTIAL

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Relationship with Suppliers, Independent Contractors and Other Service Providers

We choose our suppliers based on transparent and documented criteria such as price, quality, delivery service and reputation. Selection cannot be influenced by criteria which has no relation to the supply of the products or the services concerned.

Payments may never be made to an individual other than the contractual counter-party or the representative specified in the contract.

We expect our independent dealers, distributors and agents to comply with the policies set out in this Code of Conduct.

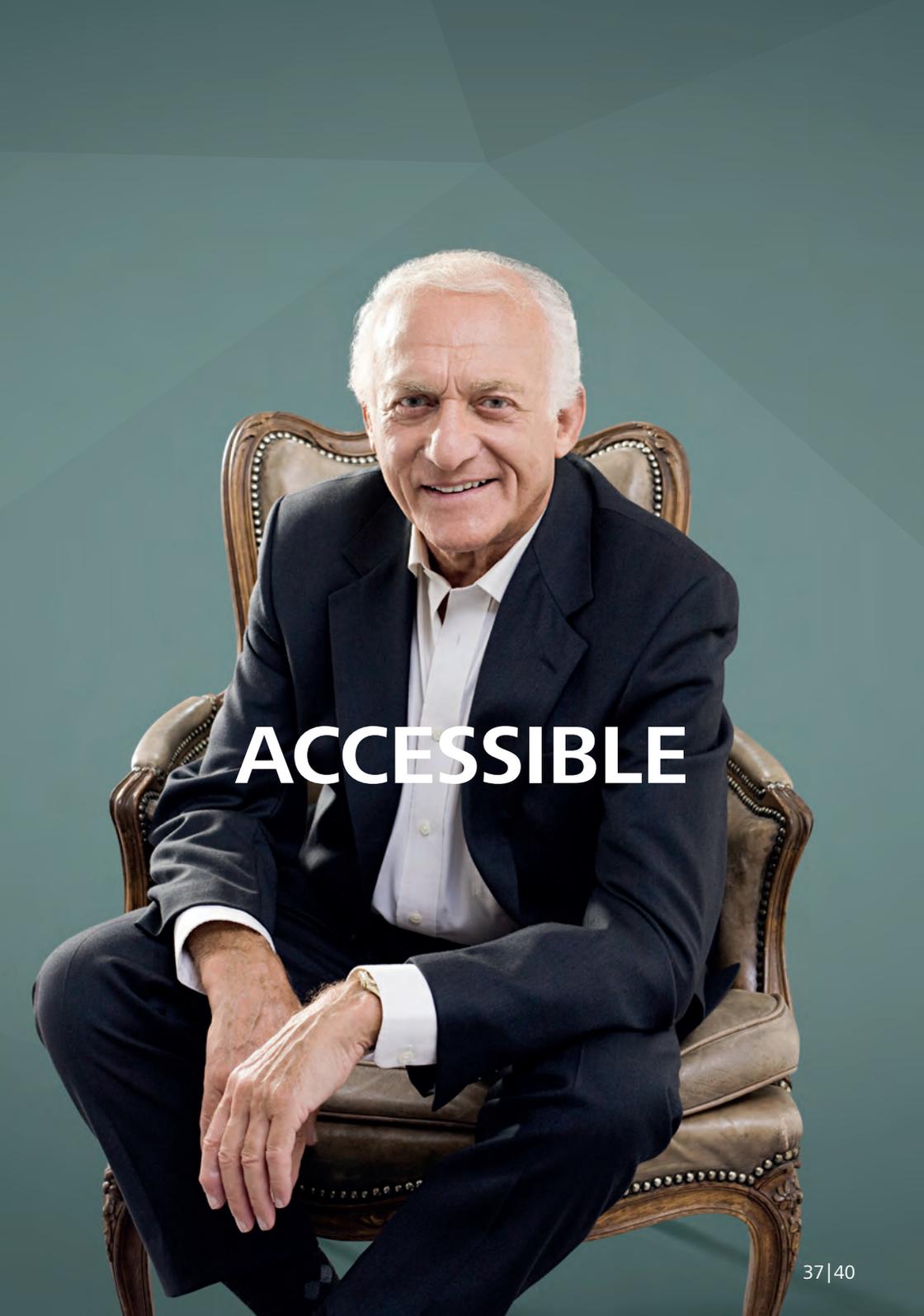
Raising Compliance Concerns

We want to achieve and maintain our standards of ethical conduct, hence it must be incorporated into our business.

Make the Code of Conduct an integrated part of all decisions which are your responsibility. Use your good judgment and common sense on issues you may encounter. In order to fully understand the legal and ethical responsibilities, you should raise any concerns associated with your work. If you are unsure about the appropriate action, you should seek advice, from either your Line Manager or Compliance Officer.

Furthermore, if you believe that another employee may be doing something that may violate these basic principles, or the law, you should advise the appropriate person. To not raise your concerns, could lead to you being held liable for another's unlawful actions. Only if you make the issues known to the company, we have the opportunity to prevent harm to employees, the company and those who depend on us.

If you raise an issue, the company can provide you with the necessary assistance. The company provides channels for you to do this without fear of repercussions. Any discrimination against an employee who raises a question or reports a concern in good faith is a serious violation of this Code of Conduct, and will be subject to strong disciplinary action, including termination of employment.



ACCESSIBLE

Key Questions

In cases of uncertainty, HARTMANN employees should ask themselves the following questions:

- Would I feel comfortable if information about my actions were investigated by the law enforcement authorities, competition authorities or other third parties?
- Would I feel comfortable if I saw the consequences of my actions on TV, online or read about them in a newspaper?
- Would I feel comfortable if I had to explain my actions to my team leader?

If the answer to any of the above questions is “no” you should not engage in any detrimental activities.

Who to talk to

This Code of Conduct is binding for all employees of the HARTMANN GROUP. If you become aware of a situation that may involve a violation of our Code of Conduct or any applicable law or regulation, or if you fear that you may be in a position of a conflict of interest, then you should report your concerns to your line manager immediately.

All issues will be handled in a confidential manner, consistent with the requirement to investigate, will comply with legal requirements, and the appropriate staff member should cooperate with law enforcement. An employee who, in good faith, seeks advice or reports misconduct, is following the rules of the Code of Conduct and, therefore, they will not be penalised for his or her actions.

You may ask questions or raise concerns by email, letter or by telephone of /with the following persons:

- Your Supervisor or Line Manager
- Your Local Compliance Officer
- The Chief Compliance Officer:
Dr. Tatjana Gohritz, PAUL HARTMANN AG
Paul-Hartmann-Straße 12
89522 Heidenheim, Germany
Phone: +49 (0) 7321 36 16 80
Fax: +49 (0) 7321 36 26 80
Mobile: +49 (0) 162 245 27 69
E-Mail: compliance@hartmann.info
- The Ombudsperson in Germany:
Lawyer Dr. Markus H. Ostrop
Rösslinweg 4
70184 Stuttgart, Germany
Phone: +49 (0) 711 248 48 48
Fax: +49 (0) 322 241 95 91 2
Mobile: +49 (0) 173 986 74 51
E-Mail: dr.ostrop@kanzlei-ostrop.de
- The Ombudsperson in the respective country, if appointed.



Going further
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