

# CODE OF CONDUCT



MEDIQ



# Introduction



When you're healthy, your thoughts know no limits; when you're ill, there's only one thing on your mind. Improving the quality of life for people with chronic diseases is what drives us at Mediq.

At Mediq, we are guided and inspired by our vision to be the partner of choice to improve the outcomes and affordability of care for people living with chronic diseases. Our plans are ambitious and our people are driven. Each new day we ask ourselves: how can we provide even better and affordable care?

Our values describe and stimulate a long term vision on doing business, building trust and engaging in sustainable relationships. They allow us to lead boldly, and with an entrepreneurial spirit to provide healthcare solutions that offer the best outcomes and perspectives for all stakeholders in the patient journey.

By doing business in a responsible and sustainable way we are what we are today, a trusted partner to healthcare professionals, payors and patients. The foundation of our business principles is integrity: we do the right thing. We are open, forthright and consistent in our work. With everyone we interact with. We are honest about our intentions and accountable for everything we do. We put high expectations on ourselves to meet these principles. Our customers, business partners and the society in general have the same high expectations.

As a tool to meet these expectations and requirements, we have complemented our strong values with a Code of Conduct. It describes the key principles to ensure that we do the right thing in the right way. Always helped, of course, by a healthy dose of common sense. Together with our vision and values, the Code will guide our decisions and actions.

Please take the time to familiarize yourself with the Code. By working to the principles which it contains, we send a clear message to those we work with about the strength of our commitment to integrity and quality. If you ever have questions or concerns about the right thing to do, please contact your manager.

Thank you for your commitment and support!

Christian Wojczewski, CEO Mediq





# Core values



Care is the core business and the true DNA of the people of Mediq. We put our patients at the heart of everything we do and always strive to make a difference. Because it matters what we do. We care about improving lives; one person at a time.

- I realize in the end it's all about the patient.
- I go the extra mile to provide better and efficient care.
- I care to make a difference because it matters what I do.



The customer comes first whether it is the payor, healthcare professional or the patient. We create client focused solutions and we take ownership of their needs. Customer drive is about delivering excellent value with enthusiasm and ambition.

- I put our customers' wishes and needs at the center of my work.
- I build win-win partnerships to continuously improve our services.
- I strive to find the best solutions for our customers.



We need to act as one because together we can achieve so much more. Champion spirit is about believing in unlimited possibilities. But also about adapting to new challenges and being eager to be better every day. With integrity and respect, we strive to create a winning team.

- I play together and I play to win.
- I embrace new ideas to change for the better.
- I take ownership for our results.



# Scope

This Code is applicable to all employees, officers and directors (together, “Employees”) of Mediq and governs all our decisions and actions, whether in our offices, warehouses, in the boardroom, at customer or supplier premises or when providing care to our patients. This Code is at the center of everything we do. It reinforces our Core Values.

We select suppliers, third party representatives and other business partners based on their qualifications, reliability and adherence to applicable laws and our values. We take reasonable care in selecting them and do appropriate reviews from time to time. We require that they commit to adhere to the law and this Code and that they have the training and tools to do so and that they shall be able to document their efforts to secure compliance with the law and this Code at our request. This also applies to any sub-supplier. Mediq may terminate the relationship with any supplier, third party representative or other business partner that fails to meet the standards in this Code after a reasonable period of time for remedying a breach.

Any employee who fails to meet the standards in this Code, or attempts to punish a subordinate for raising questions or for trying to follow this Code, may be subject to disciplinary actions designed to deter wrongdoing, up to and including termination of employment. Any employee subject to this Code who is aware of a violation and fails to report it may also face these disciplinary actions, subject to compliance with applicable laws.





# Business Practices

Working at Mediq means that everybody is held accountable for the manner in which the Core Values and this Code are complied with. In addition, as an international company, Mediq is committed to complying with the laws of the countries in which we operate. Laws and regulations are complex; however, following this Code will help ensure your compliance with applicable laws.

## **AVOID CONFLICTS OF INTEREST**

Conflicts of interest arise when we place personal, social, financial or political interests before those of Mediq. We are all responsible for avoiding situations that present – or create the appearance of – a conflict between our interests and those of Mediq. By avoiding actual conflicts of interest as well as the appearance of a conflict of interest, we will be able to act according to sound business judgment in Mediq's and our patients' best interests, rather than due to personal interest, relationship, pressure or gain. We resolve any potential conflicts of interest in a transparent and open manner. We do not seek, and avoid accepting, payments, fees, loans or services from any person or company as a condition of doing business with Mediq. We may accept gifts or entertainment as part of the normal business process only to the extent they are permitted under the law, are of nominal value and would not influence or appear to influence our business decisions. We do not accept gifts of cash or cash equivalents.

## **ANTI-KICKBACK, BRIBERY AND CORRUPTION**

Bribery and corruption damage our business and conflict with our core beliefs regarding the right way to conduct business. We prohibit bribery and corruption. None of us or anyone acting on our behalf may accept, offer or pay a bribe, kickback or other improper payment. We are also not allowed to accept or provide anything of value that is intended to win business, improperly influence a decision, or gain an unfair business advantage – or even appear to do so. Examples of “anything of value” may include, among other things, sponsorships to attend congresses, speaking fees, consultancies, services, charitable donations, political contributions, travel and/or entertainment expenses, gifts, meals, commissions and rebates.

## **DEALING WITH GOVERNMENT OFFICIALS, HEALTHCARE PROFESSIONALS, HEALTHCARE INSURERS AND OTHER PAYORS**

Working with government entities and payors, their officials and employees and with healthcare professionals and complying with the numerous complex regulations governing the healthcare industry are routine for many of us at Mediq. In addition, we help government and payors' officials in countries in which we operate to understand our business. It is important for us to share our experience and insights on matters of public policy and regulations, which may affect how we conduct business and assist patients in obtaining safe and cost-effective healthcare.

We respect the obligations of healthcare professionals to make independent decisions regarding treatment and when interacting with healthcare professionals we adhere to the following four principles:

### **The principle of separation**

Interaction with healthcare professionals must not be misused to influence through undue or improper advantages, purchasing decisions, nor should such interaction be contingent upon sales transactions or use or recommendation of products or services.

### **The principle of transparency**

Interaction with healthcare professionals must be transparent and comply with national and local laws, regulations or professional codes of conduct and always appropriate transparency shall be maintained by requiring prior written notification to the hospital administration, the healthcare professional's superior or other locally-designated competent authority, fully disclosing the purpose and scope of the interaction.

### **The principle of equivalence**

Where healthcare professionals are engaged to perform a service, the remuneration must be commensurate with, and represent a fair market value for, the services performed by the healthcare professional.

## **The principle of documentation**

Where healthcare professionals are paid or receive a fee or compensation, there must be a written agreement setting out, inter alia, the purpose of the interaction, the services to be performed, the method for reimbursement of expenses as well as the remuneration to be paid. The activities envisaged by the agreement must be substantiated and evidenced by activity reports and the like. Adequate documentation such as the agreement, related reports, invoices etc. must be retained for a reasonable period of time to support the need for, and materiality of, the services as well as the reasonableness of the remuneration paid.

We embed these principles and regulatory requirements into key operating processes. Since regulatory requirements and the elaboration of these principles in national laws and professional codes vary around the world, local management is responsible for being familiar with the nature of these laws and codes and seeking guidance if there are questions regarding permissible activities.

We obtain business through bona fide, transparent means. We expect anyone providing goods or services for Mediq, such as consultants and suppliers, to meet Mediq's standards on interactions with government officials, health care professionals, health care insurers and other payors.

## **EXPORTS AND ANTI-MONEY LAUNDERING**

Mediq is committed to maintaining compliance with applicable laws controlling imports, exports and money laundering. Mediq does business all over the world, and the laws of one country may apply to transactions or activities that occur elsewhere. Many countries maintain a program of economic and trade sanctions and embargoes against certain countries and certain parties. Prohibitions on certain exports and imports are also often in place. In addition, various governments have enacted laws that prohibit companies from participating in, or cooperating with, any international boycott that the government does not approve. In addition, many governments have anti-money laundering laws that prohibit engaging in transactions that attempt to hide the proceeds of crimes by making those proceeds look legitimate. Failure to comply with international trade laws can subject Mediq and its employees to civil and criminal penalties, including suspension or denial of trade privileges.

We check the export classifications and follow relevant international trade control regulations of all countries in which Mediq operates. We conduct business only with partners willing to provide us with proper information so that we can determine whether the payments are appropriate. We do not make a payment to an entity or accept a payment from an entity that is not a party to the transaction or is not legally entitled to receive payment. We do not accept payments in cash.

## **ANTITRUST AND COMPETITION LAWS**

Antitrust and competition laws focus on ways to ensure that businesses compete on the basis of quality, price and service. This area of law is extremely complex, and varies from country to country. These laws are referred to as antitrust, monopoly, restrictive or unfair trade, competition, price discrimination or cartel laws. In general, they seek to protect competition. They prohibit, among other things, agreements to fix prices, allocation of markets or customers, participation in group boycotts, and efforts to obtain or maintain a monopoly through something other than competition on the merits. We believe that customers and society as a whole benefit from fair, free and open markets. Therefore, we compete on the merits of our products and services and conduct business with integrity and in a manner that does not unfairly restrict trade and without anti-competitive understandings or agreements with competitors. We do not communicate with competitors about competitive business matters such as prices, costs, discounts, expansion plans, pipeline-related information, customers, suppliers, and any terms or conditions of business that could create the appearance of improper agreements or understandings. If we face a situation that may raise antitrust and competition issues, we seek guidance to determine whether or not a particular course of action might violate antitrust and competition laws.

## **DATA PROTECTION**

Mediq is a reliable partner in healthcare. As part of this, Mediq respects the right to privacy of its patients and business partners. Collection and use of personal information is important to our business. Mediq is committed to collecting and keeping only personal information that is legitimately needed to carry out our business, and to implementing measures designed to protect that information. We comply with all applicable privacy laws and every Employee is obligated to respect the right to privacy of the patient. Mediq has adopted additional policies relating to personal data protection.

# Quality, environment and ethical labor practices

## ENVIRONMENT

Protecting the environment is the right thing to do. We comply with all applicable environment related rules and regulations and aspire to adopt “best practices” in environmental procedures and standards. We are alert to opportunities to reduce our environmental impact and continuously improve these actions. Most important aspects are defined as waste, use of energy and transport. Within Mediq, we every year set ourselves some goals to minimize the environmental impact of our activities.

## QUALITY

At the very heart of Mediq’s mission is our Caring Heart which asks for commitment to develop and deliver high-quality and safe medical devices and care solutions that promote good health and well-being. We are committed to meeting or exceeding customer and regulatory requirements regarding the development, procurement, packaging, testing, supplying, maintenance and marketing of our products and services. Quality means consistently satisfying requirements of our customers by delivering medical devices and services of high quality in a timely manner. We do not stop at quality assurance. We are also committed to continuous improvement in the development, and delivery of high-quality products and care solutions for patients and healthcare professionals. We believe in creating a culture of quality by raising individual awareness to the importance of quality, in every single action, every single day. We take complaints seriously, and ensure that they are properly investigated and reported, as required, to the appropriate regulatory authorities.

## ETHICAL LABOR PRACTICES

Mediq is committed to upholding ethical labor practices and procedures across all of its locations. Our responsibility in this area includes creating awareness and understanding of human rights, employment and labor practices. By incorporating these principles into strategies, policies and procedures, and living out our values, Mediq will uphold our basic responsibilities to our people, our environment, and set the stage for our long-term success. Mediq supports and respects the protection of internationally proclaimed human rights, and we strive to ensure that we are not complicit in human rights abuses. We also uphold the freedom of association and the effective recognition of the right to collective bargaining, the elimination





of all forms of forced and compulsory labor, and the effective abolition of child labor. Our principles regarding quality, environment and ethical labor practices are founded on the following key UN and International Labor Organization conventions as amended or restated from time to time:

- Forced and compulsory labour (ILO Conventions Nos. 29 and 105)
- Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 87, 98, 135 and 154)
- Child Labour (UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146)
- Discrimination (ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women)
- Harsh or Inhumane Treatment
- Health and Safety (ILO Convention No. 155 and ILO Recommendation No. 164)
- Wages (ILO Convention No. 131)
- Working Hours (ILO Convention No. 1 and 14)
- Marginalized Populations (UN Covenant on Civil and Political Rights, art. 1 and 2)
- Environment
- Corruption

We refer for further reading to [www.ilo.org](http://www.ilo.org).

Ensuring that we maintain the highest moral and ethical standards regarding quality, environment and ethical labor practices is a top priority at Mediq. Simply put, it's the right thing to do – as an industry, as an organization, as an employer, and as human beings.





# Workplace issues

## **ANTI-DISCRIMINATION AND DIVERSITY**

Each of us should have the opportunity to reach our full potential and contribute to Mediq's success. To accomplish this, you should never discriminate or treat employees or job applicants unfairly in matters that involve recruiting, hiring, training, promoting, compensation or any other term or condition of employment. We believe in the value generated from diversity and inclusion. Your employment decisions regarding employees and applicants must always be based on merit, qualifications and job-related performance, without regard to non-job-related characteristics such as:

- Race, color, ethnicity, or national origin
- Gender
- Sexual orientation
- Age
- Religion
- Disability

Making employment decisions based on any of these personal characteristics is always against our policies. You must always act fairly and give qualified individuals the chance to develop their abilities and advance within our company. We strive to attract, develop and retain a workforce that is as diverse as the markets we serve, and to ensure an inclusive work environment that embraces the strength of our differences. This also means that we fully respect legislation and support initiatives to increase the representation of women in managerial positions in Mediq.

## **ANTI-HARASSMENT**

Mediq seeks to provide a work environment that is free from harassment of any kind and/or any other offensive or disrespectful conduct. Mediq complies with all country and local laws prohibiting harassment, and this Code prohibits harassment in the workplace. Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment. While the legal definition of harassment may vary by jurisdiction, we consider the following non-exhaustive list to be unacceptable behavior:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender or religious slurs
- Degrading comments
- Intimidating or threatening behavior
- Showing hostility towards others because of individual characteristics

You should never act in a harassing manner or otherwise cause your co-workers to feel uncomfortable in their work environment. It is important to remember that harassment, sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions.

## **SAFE WORKPLACE**

Mediq cares about the safety of its employees and conducts its activities with the highest regard for the safety and health of its Employees. Mediq values its Employees and strives to protect them. Any behavior and activities that undermine employee safety must be avoided. We are continuously working to improve our safety record. Our goal is to avoid any accident in the workplace through our rigorous compliance with applicable safety standards. Each of us is responsible for, and shares in the benefits of, a safe and healthy workplace. We comply with all employment, safety, health and security policies and procedures. We report any accidents, incidents of non-compliance, or any other matter posing a threat to safety or health of our Employees and we take action to correct unsafe activities or facilities, if present.

## **WORKPLACE VIOLENCE**

Mediq has a zero-tolerance policy for workplace violence. You are prohibited from engaging in any act that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats or any expressions of hostility, intimidation, aggression or hazing. Mediq also prohibits the possession of

weapons in the workplace. Our zero-tolerance policy for workplace violence applies to behavior on company premises, as well as to the behavior of our employees engaged in Mediq business anywhere in the world outside of our premises.

## **ALCOHOL AND DRUG-FREE WORKPLACE**

You are expected to perform your job duties free from the influence of any substance that could impair job performance. We therefore prohibit:

- Working under the influence of alcohol or illegal drugs on or off Mediq premises
- Possessing, selling, using, transferring or distributing illegal drugs while working on or off Mediq premises

## **USE OF COMPANY PROPERTY**

Mediq permits reasonable and incidental personal use of Mediq property to do such things as send email, make phone calls, make limited internet transactions according to local practice. Personal use of Mediq property, equipment, services, or facilities is prohibited beyond these limited circumstances. Always treat Mediq's property in a responsible manner. "Property" means more than buildings or desks. Much of the information that we conceive or develop as part of our job is proprietary, that is, a valuable Mediq asset. Once confidential information has been disclosed, it enters the public domain and may be difficult to safeguard. Unauthorized disclosure could destroy its value and may give unfair advantage to others outside Mediq. Confidential information can include sales, marketing and other corporate databases; intellectual property strategy and plans; marketing strategies and plans; pricing information; sales and sourcing information; non-public financial information; customer and employee records; manufacturing techniques, research and technical data and information regarding new product development.

## **IT USE GUIDELINES**

Computer technology – hardware, software, networks and the information that runs on them – is critical to our business success and must be protected. Everyone who uses a computer has the responsibility to use these resources appropriately, securely and for intended business uses only. Mediq's communications systems may be monitored or accessed by Mediq to ensure integrity and to protect against fraud and abuse. In addition, monitoring may be used to detect unauthorized access or use, or for other business purposes. You may not use Mediq computer technology or communication systems for communications that:

- Contain abusive or objectionable language
- Contain information that is illegal or obscene
- Are likely to result in the loss or damage of the recipient's work or systems
- Are slanderous
- Interfere with your work or the work of others
- Solicit employees for an unauthorized purpose

Mediq has adopted additional policies relating to information security and the acceptable use of information technology.





# Reporting irregularities

If you suspect something is not being done by the rules in your Company, you can report this. Evidently, there have to be reasonable arguments supporting the suspicion that something is wrong.

In addition, the problem must not be resolvable by consultation. It is strongly preferable for (suspicions of such) an irregularity to be reported to your manager first.

If this is not possible or desirable, it can be reported (anonymously if desired) via the integrity procedure.

Complaints may be made without the risk of steps being taken against the employee who reports the complaint. Mediq will immediately and carefully investigate all violations brought to its attention.

The free phone number and website to report irregularities are the following:

COUNTRY	FREE PHONE NUMBER	WEBSERVICE URL (General URL: <a href="http://www.speakupfeedback.eu/web/trbtap/">www.speakupfeedback.eu/web/trbtap/</a> )	ACCESS CODE
Belgium	0800-71365	<a href="http://www.speakupfeedback.eu/web/trbtap/be">www.speakupfeedback.eu/web/trbtap/be</a>	67382
Denmark	80885638	<a href="http://www.speakupfeedback.eu/web/trbtap/dk">www.speakupfeedback.eu/web/trbtap/dk</a>	02884
Estonia	800 0044 208	<a href="http://www.speakupfeedback.eu/web/trbtap/ee">www.speakupfeedback.eu/web/trbtap/ee</a>	18559
Finland	08001-13031	<a href="http://www.speakupfeedback.eu/web/trbtap/fi">www.speakupfeedback.eu/web/trbtap/fi</a>	92280
Germany	0800-1801733	<a href="http://www.speakupfeedback.eu/web/trbtap/de">www.speakupfeedback.eu/web/trbtap/de</a>	75390
Hungary	0680981359	<a href="http://www.speakupfeedback.eu/web/trbtap/hu">www.speakupfeedback.eu/web/trbtap/hu</a>	96070
Latvia	8000 2490	<a href="http://www.speakupfeedback.eu/web/trbtap/lv">www.speakupfeedback.eu/web/trbtap/lv</a>	74222
Lithuania	880090006	<a href="http://www.speakupfeedback.eu/web/trbtap/lt">www.speakupfeedback.eu/web/trbtap/lt</a>	59708
Netherlands	0800 0222931	<a href="http://www.speakupfeedback.eu/web/trbtap/nl">www.speakupfeedback.eu/web/trbtap/nl</a>	72330
Norway	800-18333	<a href="http://www.speakupfeedback.eu/web/trbtap/no">www.speakupfeedback.eu/web/trbtap/no</a>	18669
Sweden	020-798813	<a href="http://www.speakupfeedback.eu/web/trbtap/se">www.speakupfeedback.eu/web/trbtap/se</a>	62220
Switzerland	0800-561422	<a href="http://www.speakupfeedback.eu/web/trbtap/ch">www.speakupfeedback.eu/web/trbtap/ch</a>	51587

# Committed to your care

This Code will be updated periodically to stay current with changing legal and regulatory requirements. It is your responsibility to periodically review this document to ensure you understand its content. Although you are permitted to print out this document for reference, the latest English online version is the version that will control.

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