

Code of Conduct

Dornier has adopted an official Code of Conduct Policy based on the AdvaMed Code of Ethics:

<https://www.advamed.org/member-center/resource-library/advamed-code-of-ethics-on-interactions-with-health-care-professionals-in-china-english/>



In order to continually ensure a high standard of ethical conduct and compliance, Dornier has agreed to be bound by AdvaMed's Code of Ethics on interactions with Healthcare Professionals.

This document outlines the organization's expectations for ethical interactions with healthcare professionals in such contexts as:

- Dornier sponsored product training and education
- Supporting third party educational conferences
- Sales and promotional meetings
- Arrangements with consultants
- Gifts
- Grants and other charitable donations
- Interactions with Healthcare Professionals

Medical technology firms develop ongoing relationships with the healthcare professionals who assist us to design, develop, train and utilize our medical technology. AdvaMed's Code of Ethics recognizes the importance of these relationships and provides guidance for ethical business practices and socially responsible industry conduct when medical companies and healthcare professionals partner to advance medical care.

Dornier is obliged to ascertain that their interactions with healthcare professionals comply with all current laws and regulations. Dornier communicates these principles to employees with the clear expectation that they will adhere to this code.

Compliance to Dornier's Code of Conduct is mandatory for all employees.

Statement of Compliance with California Law

Dornier has created its Comprehensive Compliance Program (“CCP”) to meet the nature of its business as a medical device manufacturer. While California Health and Safety Code §§ 119400-119402 makes reference to compliance with the Pharmaceutical Research and Manufacturers of America’s Code on Interactions with Healthcare Professionals (“PhRMA Code”), Dornier manufactures medical devices rather than pharmaceutical products. Therefore, Dornier determined that it was more appropriate for the company instead to adopt policies and procedures consistent with the AdvaMed Code of Ethics on interactions with Healthcare Professionals (“AdvaMed Code”) which, although substantially similar to the PhRMA Code, recognizes significant differences applicable to the medical device industry. Dornier is committed to the highest standards of ethical and legal conduct. We have developed a CCP that is reasonably designed to prevent and detect violations, and includes the following:

1. **Written Standards:** We have established and implemented a Code of Conduct and Ethics as well as a Compliance Policy that is consistent with the provisions of the AdvaMed Code.
2. **Leadership and Structure:** We have established effective oversight over the CCP, including selection of a Compliance Officer to develop, operate, and monitor the CCP and creation of a compliance committee to provide strategic direction and oversight.
3. **Training and Education:** All employees received copies of our Code of Conduct and Ethics and Compliance Policy and certify that they have read, understood, and agree to abide by these written standards. We also provide ongoing comprehensive live training to those employees who regularly interact with healthcare professionals.
4. **Lines of Communication:** To facilitate an open door environment, we have adopted confidentiality and non-retaliation policies as well as mechanisms to facilitate anonymous reporting.
5. **Auditing and Monitoring:** Our CCP includes ongoing efforts to monitor, audit, and assess compliance.
6. **Enforcement:** Dornier will consistently investigate and appropriately respond to violations.
7. **Corrective Action:** Dornier will take appropriate corrective action to prevent violations from recurring, including repairing any gaps in our policies or procedures.