



# Supplier Code Of Conduct

DORNIER. ADVANCING UROLOGY CARE WITH YOU.

# How we understand sustainability in supplier management

The Dornier MedTech Group and its affiliated companies (collectively “Dornier MedTech”) recognize sustainability as an essential component of its business processes. As a company in the medical technology industry, which is known for its pioneering technologies and revolutionary therapies in urology, we obtain our raw materials, goods, and services from suppliers worldwide to secure the sustainable success of our customers with innovative products and service solutions.

Dornier serves diverse customers, such as hospitals, surgery centers, universities, private and public urological practices, and mobile service providers. In the field of kidney stone treatments, Dornier MedTech is one of the technology leaders improving the lives of people around the world.

We base our activity on responsible corporate management that aims for long-term creation of value. For this reason, we include suppliers directly in our sustainability strategy. In addition to our procedural, commercial, and technical criteria, we also take note of social and ecological aspects, such

as human rights, working conditions, the prevention of corruption, and environmental protection. When there are conflicts, product/service, market, region, costs, quality, reliability, innovation, and sustainability are essential factors for us in selecting and evaluating suppliers. Dornier MedTech expects its suppliers (“Suppliers”) in their activities to comply with the applicable national laws, the principles of the United Nations Global Compact, and this Dornier MedTech’s Supplier Code of Conduct (“Code”).

Furthermore, the Suppliers are expected to introduce appropriate procedures that support compliance with the applicable laws in their businesses and promote ongoing improvement in relation to the principles and requirements of the Code. This Code shall also apply to any entity that indirectly provides goods/services to Dornier MedTech through such suppliers.

Affiliated companies, within the meaning of this policy, are defined as companies that directly or indirectly have ownership of at least 50% of the voting share capital of the other company.



# 1 | General principles, law, and justice

Suppliers are expected to comply with all applicable laws and other relevant regulations of the countries in which they operate and provide goods and services. Such laws shall include, without limitation, employment/labor laws, company law, environment, antitrust, taxation, personal data protection, etc.

Business associates must be dealt with fairly. Contracts are adhered to, whereby changes in the general conditions are taken into account.

## 2 | Ethics

### a. Corruption

When dealing with business associates (clients, suppliers) and government institutions, the interests of the company and the private interests of employees are strictly separated from each other on both sides. Activities and (purchase) decisions are made free of inappropriate considerations and personal interests. The applicable laws on corruption must be observed in any case. The following aspects must be observed among others.



## • Offenses related to public office holders:

The granting of personal benefits (in particular of a pecuniary nature such as payments and loans, including the granting of minor gifts over a prolonged period of time) by Suppliers and their employees or agents to public office holders (such as civil servants or employees in the public sector) with the aim of benefiting the Suppliers or obtaining them for themselves or third parties are not permitted.

## • Offenses in business dealings:

Personal pecuniary benefits in return for preferential treatment in business dealings must not be offered, promised, granted, or approved. Similarly, when dealing with business associates, they should not demand personal benefits. Dornier MedTech expects Suppliers to impose on their employees an obligation not to be promised any corresponding benefits.

Suppliers and their employees or agents may not offer, promise, demand, grant, or accept any gifts, payments, invitations, or services in business dealings that are granted with the intention of influencing a business relationship in an impermissible manner or where there is a risk of jeopardizing the business associate's professional independence. This is generally different from gifts and invitations that are exchanged within the context of regular business hospitality, custom, and courtesy.

Dornier MedTech expects Suppliers to have established a policy on accepting and granting gifts and invitations to business entertainment and events. Exceptions may be allowed with regard to low-value token gifts, business meals, and events held by their own company as well as by business associates that are appropriate in each case. Such policies must be communicated transparently within the Supplier's company as well as to its existing and potential business associates. Dornier MedTech may request to see such policies from time to time.

Suppliers shall disclose, at the first instance or any time during an ongoing contractual relationship, if there is a potential conflict of interest relating to its potential and/or existing contractual relationship with Dornier MedTech. Suppliers are to appoint an individual to represent them who can be contacted if the Supplier's employees are involved in a conflict of interest or if they are uncertain whether a conflict of interest exists or could arise.

## **b. Conduct vis-a-vis competitors (antitrust law)**

Dornier MedTech expects Suppliers to engage in fair competition and adopt fair practices. For this reason, the Supplier shall comply with the applicable laws that protect and promote competition, particularly the applicable antitrust laws and other laws regulating competition.

When dealing with competitors, these regulations prohibit particular agreements and other activities that impact prices or conditions, allocate sales territories or customers or impede free and open competition in a disallowed manner. Furthermore, these regulations prohibit agreements between customers and suppliers, whereby customers are restricted in their freedom to determine their prices and other conditions autonomously when on-selling (determination of prices and terms).

## **c. Forced labor and human trafficking**

Dornier MedTech expects Suppliers to reject any form of forced labor and human trafficking.

## **d. Child labor**

Dornier MedTech expects Suppliers to observe the United Nations regulations on human and children's rights. In particular, the Supplier undertakes to comply with the Minimum Age Convention for admission to employment (International Labor Organization Convention 138) and the convention on the prohibition and immediate measures to eliminate the worst forms of child labor (International Labor Organization Convention 182). If a national regulation provides for stricter standards on child labor, these must take priority.

## **e. Freedom of association**

Suppliers shall, per applicable national legislation, respect the rights of their employees, enabling them to appoint representatives and engage in collective bargaining with them.

## **f. Working hours and remuneration**

Suppliers shall comply with the applicable national legislation with regard to working hours, remuneration, and compensation.



## g. Conflict minerals

Suppliers shall comply with all the statutory regulations that apply to conflict minerals. If a product supplied by the Supplier contains one or more of what are designated as conflict minerals (tin, tantalum, tungsten, gold, or the corresponding ores), Suppliers shall disclose to Dornier MedTech the presence of such conflict mineral in the supply chain.

## h. Intellectual property and privacy

Suppliers are reminded not to infringe any intellectual rights, copyrights, patents, and trademarks. Where any intellectual property rights are developed as part of the contractual arrangement with Dornier MedTech, the ownership of such intellectual property rights shall be as defined in the signed contract.

Suppliers shall comply with all relevant data privacy laws and regulations concerning the collection, use, disclosure, retention, and/or processing of the personal data of Dornier MedTech's employees and any individual customers.



## 3 | Social Responsibilities Principles

Suppliers are expected to live up to their social responsibilities in all their business activities. These include:

### a. Human rights

Suppliers are expected to respect and support compliance with internationally acknowledged human rights.

### b. Discrimination

Suppliers are expected to oppose any form of discrimination in the context of the applicable rights and laws. This relates in particular to discrimination against employees based on their sex, race, disability, ethnic or cultural origin, religion or belief, age, or sexual orientation.





## c. Occupational health and safety protection

Suppliers are expected to guarantee occupational health and safety in the workplace within the context of national regulations. In the process, the Supplier shall support the ongoing development of improvements in the work environment.

Suppliers shall be responsible for ensuring that all required permits, licenses, and registrations will be obtained, maintained, and kept up to date.

## d. Fair working conditions

Suppliers shall respect their employees' right to freedom of association and working hours within the context of the applicable rights and laws.

## e. Environmental protection

Suppliers are expected to make a sustainable commitment to the goal of protecting the environment for present and future generations. Laws that have been enacted to protect the environment must be observed. Suppliers will use resources sparingly and minimize their impact on the environment. The Supplier will use resources sparingly and minimize their impact on the environment. Suppliers shall encourage their employees to take environmentally conscious actions.

## f. Business secrets

Suppliers are expected to oblige all their employees to observe the company and business secrets of its business associates. Confidential information and documents must not be forwarded to third parties without authorization or made accessible to them in any other way unless authorization has been given to do so or it involves publicly accessible information.

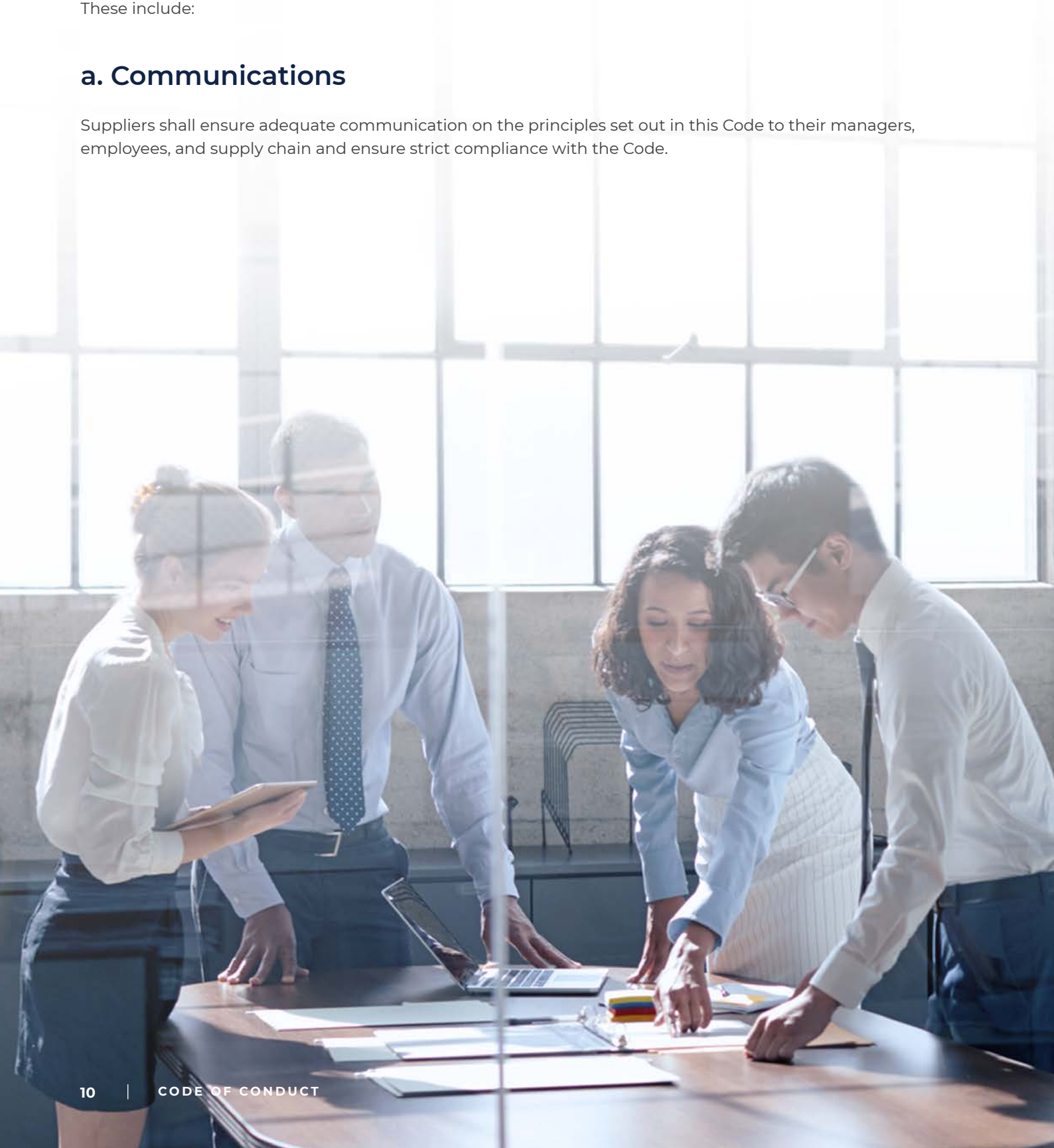


## 4 | Management Systems For Compliance

Suppliers are expected to implement management systems to facilitate compliance with the Code and all applicable laws and to promote continuous improvement to the expectations outlined in this Code. These include:

### a. Communications

Suppliers shall ensure adequate communication on the principles set out in this Code to their managers, employees, and supply chain and ensure strict compliance with the Code.



## **b. Risk management**

Suppliers are expected to implement appropriate measures to manage any compliance risk exposures stated in this Code and/or mechanisms to identify, determine, and manage risks in all areas addressed by this Code and all applicable legal requirements.

## **c. Compliance with the Code**

Dornier MedTech reserves the right to conduct checks on Supplier's compliance with this Code. Any breach of the obligations stated in this Code may be considered as a material breach of contract by the Supplier for which Dornier MedTech may exercise its rights as per the provisions stated in the contract, including the right to terminate the contract with the Supplier who demonstrably fails to comply with the Code or do not aim for and implement any improvement measures after Dornier MedTech has given them a reasonable period of time to do so.

Furthermore, the Supplier undertakes to fulfill and comply with the principles and requirements of the Supply Chain Sourcing Obligations Act "Lieferkettensorgfaltspflichtengesetzes" and to implement them in its daily business routine to the best of its ability.

## References

- <sup>1</sup> UN Global Compact. (n.d.). Homepage: UN Global Compact. Homepage | UN Global Compact. <https://unglobalcompact.org/>
- <sup>2</sup> United Nations. (n.d.). Human rights. United Nations. <https://www.un.org/en/global-issues/human-rights>
- <sup>3</sup> International Organization for Standardization. (2022, June 21). International Organization for Standardization. ISO. <https://www.iso.org/home.html>
- <sup>4</sup> International labour organization. (n.d.). Labour standards. <http://www.ilo.org/global/standards/lang--len/index.htm>

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