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CODE OF CONDUCT FOR BUSINESS PARTNERS

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PREAMBLE

A | VAMED is the leading group of companies in planning, construction and management of complex health care facilities, with the highest level of competence based on many years of worldwide experience as a partner in public health care.

B | It is the corporate culture of VAMED to act in accordance with the law and always ethically correct. VAMED not only focuses on achieving results, but also on the way in which these results are achieved.

C | VAMED is committed to ensuring that the ethical principles supported by the VAMED-group are also supported by its business partners. Compliance with the law is a matter of course.

D | This VAMED-Code of Conduct for Business Partners ("Code") is a guide to these ethical principles and legal obligations. However, it does not constitute a complete set of regulations covering all applicable laws, guidelines and standards.

If a provision of this Code deviates from statutory provisions, the provision shall apply always which, on the one hand, corresponds to the applicable body of law and, on the other hand, is the more demanding with regard to the ethical principles supported by VAMED.

E | If a business partner violates these principles, VAMED reserves the right to decide whether to continue the business relationship.

01 | PRINCIPLES OF BUSINESS PROCESSING

01 | 01 PRINCIPLE OF EQUIVALENCE

Performance and consideration must always be in an appropriate relationship to each other.

01 | 02 PRINCIPLE OF DOCUMENTATION

All paid and unpaid services within the scope of business conduct and contractual relationships with our business partners are subject to written form and must be documented and archived in a suitable form.

01 | 03 PRINCIPLE OF TRANSPARENCY

VAMED expects that all paid and unpaid services rendered within the scope of the collaboration and their purpose will be disclosed to the responsible employee of VAMED upon request. The relevant principles (principle of equivalence, principle of documentation, principle of separation) must always be observed.

01 | 04 PRINCIPLE OF SEPARATION

Services for VAMED shall be clearly separated from any paid or unpaid services (e.g. cash or non-cash benefits, like, goods or services) provided to employees of VAMED. There shall be no connection between such services.

VAMED expects to be actively informed by its business partners about situations that could lead to a conflict of interest.

02 | FAIR COMPETITION

02 | 01 COMPLIANCE WITH STATUTORY PROVISIONS

All business affairs must be conducted in compliance with the legal provisions for the protection of fair competition.

No unlawful agreements may be made with business partners that have the effect or purpose of impairing competition. Not only written and verbal agreements are prohibited, but also concerted practices with the same objective.

02 | 02 COMPLIANCE WITH ANTITRUST REGULATIONS

The antitrust regulations applicable in the respective country, in particular when participating in joint ventures or consortia, must always be observed.



02 | 03 COMPLIANCE WITH EXPORT CONTROL AND EMBARGO REGULATIONS

Compliance with existing export control and embargo regulations shall be ensured.

03 | PREVENTION OF CORRUPTION

03 | 01 BRIBERY, ADVANTAGES OR ACCEPTANCE OF GIFTS

It is prohibited to demand, accept or be promised an advantage from another person for oneself or a third party for performing or omitting a legal act in breach of duty and/or to offer, promise or grant an employee or agent of a company a not merely minor advantage for that person or a third party for performing or omitting a legal act in breach of duty.

Furthermore, it is not permitted to offer, promise or grant an advantage to a public official, a politically exposed person (PEP) or an arbitrator for the performance or omission of an official business in breach of duty or for the initiation of the performance or omission of a future official business in breach of duty or for the performance or omission of an official business in accordance with duty, as well as to an expert for the rendering of an incorrect finding or expert opinion for this person or a third party.

Advantages shall not only be deemed monetary payments, but any material or immaterial benefits such as the provision of airline tickets, the giving of gifts, invitations to business meals, the assumption of hotel costs, etc.

03 | 02 GRANTING OF GIFTS

The granting of gifts with the intention of initiating business is not permitted.

Only customary attentions appropriate to the culture of the respective country are permissible, which do not exceed the negligibility limit according to the legal standards of the respective country and which are in accordance with the general VAMED principles.

04| PREVENTION OF **MONEY LAUNDERING & TERRORIST FINANCING**

Business partners must ensure that the applicable laws on the prevention of money laundering and terrorist financing are complied with

05 | HANDLING OF DOCUMENTS & INFORMATION

05 | 01 PURPOSE OF THE TRANSFER

Technical documents and/or commercial information received from VAMED in business dealings may only be used for the purposes of cooperation with VAMED.

05 | 02 TRANSFER OF DOCUMENTS

Any use of these documents and information other than for the purpose of cooperation with VAMED and/or transfer to third parties is not permitted.

06 | ACCOUNTING & REPORTING

All documentation, accounting and data collection must be complete, orderly and correct, made on time and in accordance with legal and contractual requirements.

07 | HEALTHY, SAFE & SOCIAL WORKING ENVIRONMENT

07 | 01 HEALTH AND SAFETY

As a group active in the healthcare sector, VAMED is committed to the health and safety not only of its own employees but also of the employees of its business partners and of all people affected by its business activities. VAMED also expects this from its business partners. By setting up and applying appropriate occupational safety systems and by training employees, necessary precautionary measures are taken against accidents and damage to health, in particular when handling hazardous substances. Timely and affordable access to quality health care shall be ensured. Excessive physical or mental fatigue shall be prevented through appropriate measures.

07 | 02 COMPLIANCE WITH HEALTH PROTECTION REGULATIONS

VAMED insists that in the course of the realization of its projects, all regulations that serve to protect the health and safety of employees and that are in line with the social values of the European Union and the applicable legislation are always complied with.

07 | 03 WORK WITHOUT INTERFERENCES

VAMED expects its business partners to perform their work without interference from alcohol, illegal drugs or other substances. This also applies to the taking of medically prescribed medication, insofar as this impairs the ability to work.

07 | 04 COMPLIANCE WITH HUMAN RIGHTS AND ILO CONVENTIONS

VAMED treats all of its employees with dignity and respect, believes in the value of diversity of people and workplace and, in addition to complying with applicable labor law as a matter of course, is committed to respecting human rights as defined in the United Nations Universal Declaration of Human Rights, the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights of 19 December 1966, and the ILO (International Labour Organization) Conventions. VAMED expects its business partners to feel equally committed.

07 | 05 NO DISCRIMINATION

VAMED expects its business partners to support equal opportunities for all people and to comply with the prohibition of discrimination in the workplace.

Business partners will not discriminate against any employee on the basis of age, gender, color, sexual orientation, national, social or ethnic origin, disability, political opinion, labor union membership, pregnancy, religion or marital status in hiring and terminating employment, as well as career advancement through promotion, performance bonuses, salary grading and/or assignment of duties.

07 | 06 NO THREAT OR OTHER HARASSMENT

VAMED expects its business partners not to tolerate violence, intimidation, coercion or threats, sexual or other harassment towards its employees. The hiring or use of security guards must be refrained from if, during their deployment, persons are treated or injured in an inhumane or degrading manner or if freedom of association is impaired.

07 | 07 NO FORMS OF CHILD AND FORCE WORK

VAMED rejects all forms of illegal work and expects its business partners to supply goods and services that exclusively originates from legal work and on no form of child labor or forced or slave labor. All work must be voluntary and without the threat of punishment or any other serious evil.

The age of employees shall not be less than the age at which compulsory education ends under the law of the place of employment and in any case not less than 15 years. Young employees under the age of 18 shall not be employed in work which is harmful to the health, safety or morals of children. Special protection regulations must be observed. The UN Convention on the Rights of the Child and the UNICEF criteria against harmful exploitation shall be observed

07 | 08 FAIR PAY

The remuneration for regular working hours and overtime must be reasonable and equal to the applicable statutory minimum wage or industry minimum standards, whichever is higher.

07 | 09 FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

The right of employees to form and join organisations of their choice, to bargain collectively and to strike shall be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of employees for the purpose of collective bargaining shall be provided.

08 | ENVIRONMENTAL PROTECTION

08 | 01 SUSTAINABILITY

When realizing projects, environmentally friendly service provision and sustainability must always be taken into account. The diversity, character and beauty of nature and the landscape as well as biodiversity (ecosystems, biodiversity, habitats) must be preserved through the sustainable use of nature and its resources.

08 | 02 ECOLOGICAL PRINCIPLE AND PROTECTION OF NATURAL LIVELIHOODS

Within the scope of what is economically justifiable, priority must therefore always be given to ecologically valuable solutions. Legal regulations for environmental protection must be observed without restriction. Likewise, irrespective of their legal implementation, the bans on the export of hazardous waste in the Basel Convention of 22 March 1989, the use of mercury in the Minamata Convention of 10 October 2013 and the handling of persistent organic pollutants in the Stockholm Convention of 23 May 2001 in the current versions must be observed.

Harmful soil changes, water and air pollution, noise emissions and excessive water consumption shall be refrained from if this harms the health of persons, significantly impairs the natural basis for the production of food or prevents the access of persons to safe drinking water or sanitary facilities. Land, forests or waters whose use secures the livelihood of persons shall not be taken in violation of legitimate rights.

08 | 03 RESPONSIBLE RAW MATERIAL SUPPLY

Natural resources must always be used sparingly. Business partners are requested to ensure that the raw materials used in the products they manufacture are not used directly or indirectly to support groups guilty of human rights violations. Business partners should take due care regarding the origin and chain of custody of these raw materials.

09 | COMPLAINTS PROCEDURE

The business partner shall pass on information received from VAMED on accessibility, responsibility and the conduct of a complaints procedure to its employees in an appropriate manner. The complaints procedure must be accessible to employees while maintaining confidentiality of identity and effective protection against discrimination.

10 | RESPONSIBILITY OF THE **MANAGEMENT**

10 | 01 SECURING WITHIN THE COMPANY

The business partner or the management of the business partner shall take appropriate measures to ensure that the provisions of this Code are observed by its employees.

10 | 02 SECURING IN THE SUPPLY CHAIN

If VAMED is supplied by its business partners with goods and services which they themselves have procured from third parties, VAMED requires that they take adequate measures to ensure appropriate compliance with the provisions of this Code.

Gender equality

We attach great importance to the equal treatment of the sexes. We therefore use a gender-neutral language in this Code as far as possible. For reasons of better readability, we may deviate from this in some places. However, where personal terms are used, these always include all gender identities equally.



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