



WiBU Group

**BUSINESS PARTNER
CODE OF CONDUCT**

BUSINESS PARTNER CODE OF CONDUCT of the WiBU Group

PRÄAMBEL

- (A) The WiBU Group is a full-service provider in the care and healthcare market. Together with our network of business partners, we have been serving our customers* in Germany and Europe for over 100 years. We owe our success to our excellent services and products, our employees & business partners and, last but not least, our corporate values. For us, ethically and morally impeccable and legally impeccable conduct at all times forms the basis of our business activities.
- (B) With this Code of Conduct for Business Partners ("**BUSINESS PARTNER CODE OF CONDUCT**"), we provide our business partners and ourselves with rules on how we want to work together and what we stand for as WiBU Group. Our Business Partner Code of CONDUCT shall be observed by all our business partners. In doing so, we are pursuing our goal of a cooperation and corporate culture characterized by integrity, respect and fair, responsible conduct.
- (C) Many of the following principles of conduct are therefore a matter of course that we have practiced for a long time in our day-to-day work and expect the same from our business partners.

* For reasons of better readability, we use the generic masculine in the following, which includes all other forms.

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1 SCOPE OF APPLICATION / BASIC PRINCIPLE OF INTEGRITY

- 1 This BUSINESS PARTNER CODE OF CONDUCT applies to all our business partners and their entire activities. Our business partners are committed to ethical, socially responsible and fair conduct and will comply with this BUSINESS PARTNER CODE OF CONDUCT worldwide, even if other standards of conduct are tolerated or customary locally.
- 2 In addition, cooperation within the WiBU Group and between the WiBU Group and its business partners is characterized by appreciation and integrity. To protect this mutual trust, to eliminate uncertainties and to ensure the integrity of the persons involved, the four-eyes principle applies at all WiBU Group seniority levels.

2 PRINCIPLES OF CONDUCT

2.1 Working Environment

2.1.1 Respect for human and employee rights

We do not tolerate human rights violations. The WiBU Group outlaws child labor and all forms of forced labor.

- 3 Our business partners are prohibited from promoting or profiting from child labor. Among other things, they are obligated to comply with ILO Convention No. 138 (Minimum Age) and No. 182 (Worst Forms of Child Labor).
- 4 The same applies to any form of forced labor ("*modern slavery*"). Any work for one of our business partners must be carried out on a voluntary basis and without coercion. Every employee must be allowed to keep his or her identification documents (in particular passport, identity card and work permit). Our business partners pay at least the statutory minimum wage or the minimum wage applicable by collective agreement or customary in the industry.

2.1.2 Equal treatment and non-discrimination

We focus on diversity and are clearly committed to not discriminating against anyone, be it on the basis of gender, nationality, skin color or origin, religion or ideology, trade union activity, age, sexual identity or disability.

- 5 Our business partners also do not tolerate any form of discrimination or unequal treatment and are committed to taking appropriate measures to ensure equal, fair and impartial treatment of all employees. These rules apply equally at every location and in every business area.

2.1.3 Occupational health and safety

The safety and health of all our employees is a central requirement of our corporate activities.

- 6 Our business partners comply with the local or industry minimum standards with regard to workplace safety and working hours (in the absence of such standards, the

ILO standards apply). The WiBU Group expects its business partners to offer their employees regular training on accident prevention and other applicable occupational health and safety rules.

2.1.4 Freedom of association

The WiBU Group respects the right to freedom of association.

7 We expect our business partners to respect this as well, including the right to conclude collective bargaining agreements and the right to take industrial action (strike).

2.1.5 Environmental protection

We are committed to using natural resources responsibly and as sparingly as possible. Environmental and climate protection are important to us.

8 Our business partners undertake to behave in an environmentally conscious and climate-friendly manner and to comply with the relevant legal requirements. We also expect our business partners to use resources such as energy, water and raw materials in a responsible and resource-conserving manner. They also undertake not to cause any detrimental changes to the soil, contamination of the air or surface and groundwater and to reduce noise emissions to a possible minimum.

2.2 Business Relations

2.2.1 Fair and lawful competition

We believe in fair competition, in which we want to assert ourselves with the high quality standards of our products and services. We therefore strictly adhere to laws that protect and promote competition, in particular the applicable competition and antitrust laws.

9 This also means that we expect our business partners to comply with the rules of fair and lawful competition and in particular not to violate the rules of antitrust law (including in particular the rules on price fixing).

2.2.2 Avoidance of corruption

We do not tolerate corrupt behavior on the part of employees, managers or directors.

10 Our business partners must therefore comply with all applicable national and international anti-corruption rules and laws and not tolerate or promote any corrupt behavior or behavior that could be interpreted as such. They therefore neither offer, promise or grant advantages to public officials or decision-makers in the private sector. They already avoid the "appearance" of wanting to receive an economic advantage or preferential treatment. The same applies in principle to donations and gifts.

2.2.3 Anti-money laundering prevention

The prevention of money laundering is a high priority for the companies of the WiBU Group.

- 11 The WiBU Group expects its business partners to comply with and implement all statutory measures to prevent money laundering and to control payment flows.

2.3 Information

2.3.1 Dealing with Information

One of the WiBU Group's most valuable assets is business information, most of which is not publicly accessible. Trade and business secrets are therefore safeguarded and protected under all circumstances.

- 12 Our business partners (as well as their affiliated companies) therefore do everything necessary to protect their IT systems in particular against external access. They do not grant external parties unsupervised access to their business premises or uncontrolled electronic access to their data.

2.3.2 Data protection

The protection of personal data, in particular that of our employees, our customers and our business partners, is of great importance to us. We only collect and process personal data if this is legally permissible or if we have the consent of the respective data subject.

- 13 We expect our business partners to protect the personal data of their employees, customers and business partners to the same extent and to only collect and process this data if they have the appropriate consent. In doing so, they comply with the legal regulations applicable at the place of collection and at the place of data processing.

2.4 Conflicts of Interest

2.4.1 Conflict of Interest

The WiBU Group makes business decisions exclusively in the best interests of its group companies.

- 14 We expect our business partners to avoid conflicts between the private interests of individual employees, including their relatives or other related persons or organizations, and those of our business partners and the WiBU Group as far as possible. If such conflicts arise, they are disclosed and appropriate measures are taken to resolve them.

2.4.2 Lobbying and association work

Lobbying and association work is only permitted within the limits provided for by law.

- 15 Our business partners always comply with the legal requirements for permissible lobbying. They do not exert any unfair influence on legislation and politics and, when cooperating in business associations, strictly ensure that their conduct is permissible under competition law.

3 IMPLEMENTATION & APPLICATION OF THESE PRINCIPLES OF CONDUCT

- 16 We expect our business partners and their affiliated companies to be familiar with all the principles of conduct set out in this BUSINESS PARTNER CODE OF CONDUCT and to implement them on their own. Anyone who does not share the principles set out in this BUSINESS PARTNER CODE OF CONDUCT cannot be our business partner.

- 17 We also expect our business partners and their affiliated companies to comply with these requirements diligently. Our business partners undertake to align their actions and those of their employees with these principles and to adapt them on an ongoing basis. We expect you to pass on the obligations and standards from this BUSINESS PARTNER CODE OF CONDUCT to your business partners and to oblige them to pass them on as well. As our business partner, you undertake to take appropriate measures vis-à-vis your business partners to review and enforce these principles and to identify, avoid and mitigate corresponding risks (e.g. through a risk management system and the implementation of preventive and corrective measures).

- 18 In order to comply with these principles, we carry out risk-based checks on our business partners. We expect you to inform us immediately if the aforementioned principles are not complied with in our business relationship or if there is a risk of non-compliance. In the event of a (suspected) breach of these principles, the WiBU Group is entitled to request corresponding information from its business partners, their affiliated companies and – as far as legally possible – their respective business partners and to carry out checks on our business partners and their affiliated companies (including any operating sites) with regard to compliance with this BUSINESS PARTNER CODE OF CONDUCT or to have them carried out by third parties. A material breach of these principles may give rise to the right to (extraordinary) termination of our contractual agreements (in accordance with the provisions of the respective contract). Other contractual remedies to which we are entitled remain unaffected.

4 WHISTLEBLOWER

- 19 This BUSINESS PARTNER CODE OF CONDUCT can only be successfully implemented if misconduct is communicated and addressed openly and clearly. Information on any misconduct can be reported via our whistleblowing system WhistleFox, either anonymously or by stating the identity of the person making the report. Our whistleblowing system can be reached as follows: https://www.wibu.care/de-de/ueber-wibu/#interne_meldestelle

- 20 Our whistleblower system is available to our employees as well as our business partners and other third parties and offers the opportunity to report risks in connection with the (possible) violation of human rights or (possible) environmental violations.

Our business partners ensure that no measures are taken that could prevent their employees from using our whistleblower system. The WiBU Group expects its business partners to also create or maintain suitable grievance mechanisms.

5 COMMON UNDERSTANDING

²¹ By signing this BUSINESS PARTNER CODE OF CONDUCT, you acknowledge that it is binding for our cooperation. This also applies to subsidiaries insofar as this is permissible under applicable law. We reserve the right to request a signed version of this BUSINESS PARTNER CODE OF CONDUCT from them as well.

Name of the company (with stamp/seal)

Name of the company representative

Place and date

Signature

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