

Code of Conduct for MedCap's Suppliers and Business Partners

This Code of Conduct defines the basic requirements placed on MedCap's and its Subsidiaries' (jointly "the customer") suppliers of goods and services concerning their responsibilities to operate in an environmental and socially sustainable manner.

The customer reserves the right to reasonably change the requirements of this Code of Conduct due to changes of the customer's Compliance Program. In such event the customer expects the business partner to accept such reasonable changes.

The supplier declares herewith:

Legal compliance

- to comply with applicable laws and regulations of their country of origin as well as with applicable laws and regulations of countries where they operate. Suppliers are expected to act in accordance with relevant international conventions and guidelines set by international organizations, including the United Nations and the Organization for Economic Co-operation and Development.

Prohibition of corruption and bribery

- to tolerate no form of and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any private or government official for the purpose of influencing decision making in violation of law.

Respect for the basic human rights of employees and fair labor practices

- to promote equal opportunities for and treatment of its employees irrespective of skin color, race, gender, age, nationality, political or religious conviction, ethnicity, social background, disabilities, sexual orientation, or other distinctive qualities
- to respect the personal dignity, privacy and rights of each individual
- to refuse to employ or make anyone work against his will
- to refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination
- to prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative
- to provide fair remuneration and to guarantee the applicable national statutory minimum wage
- to comply with the maximum number of working hours laid down in the applicable laws
- to recognize, as far as legally possible, the right of free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions.

Prohibition of child labor

- to employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.

Health and safety of employees

- to take responsibility for the health and safety of its employees
- to control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases
- to provide training and ensure that employees are educated in health and safety issues
- to set up or use a reasonable occupational health & safety management system.

Environmental protection

- to maintain a low climate footprint
- to act in accordance with the applicable statutory and international standards regarding environmental protection
- to minimize environmental pollution and make continuous improvements in environmental protection
- to set up or use a reasonable environmental management system.

Supply chain

- to use reasonable efforts to promote and follow up among its supplier's compliance with this Code of Conduct or equivalent standards
- to comply with the principles of non-discrimination regarding supplier selection and treatment.
- not conduct business or dealings with a sanctioned country, group, organization or individual.
- to apply high commercial ethical standards and compete within the framework of competition rules in the markets where they operate. No supplier shall be part of any illegal price cooperation, illegal market sharing or other practice in violation of applicable competition laws.

Gifts, hospitality and expenses:

- to prohibit the offer or acceptance of gifts, hospitality, expenses or any benefit, where they could influence the recipient's integrity.
- Not to offer or receive gifts in situations of contract negotiation, bidding or award.

Money laundering:

- to be firmly opposed to all forms of money laundering and take steps to prevent its financial transactions from being used by others to launder money.

Accuracy of records:

- to have honest and accurate recording of business and financial records that are reported in a non-misleading manner in accordance with generally accepted accounting principles.

Information security

- to protect confidential information disclosed by customer from inappropriate use or storage.
- To only provide access to customer confidential information to persons within its organization having a need to know the information in connection with performance by the Business Partner of its obligations to the customer. This may require entering into separate confidentiality agreements with the customer.

Compliance and reporting of deviations

- Failing to comply with this Code is viewed as a serious matter, which may lead to termination of the contract, claims for appropriate compensation, disqualification as a supplier, and reporting to the relevant authorities. Suppliers shall without delay inform customer of any concerns or potential breaches to this Code and shall provide full cooperation in relation to the customer's investigation of the matter. The Business Partner must take appropriate action to remedy any potential breach and prevent a recurrence of such breach in the future.
- The customer or an external auditing company, selected by the customer, shall have the right to perform onsite audits or assess the Business Partner's compliance with this Code and gain access to all relevant documents, premises and information without delay.