

**HARTMANN**



Helps. Cares. Protects.

# The Compliance Heroes of HARTMANN

Code of Conduct | 6<sup>th</sup> edition



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## Foreword

Dear readers,

The HARTMANN GROUP is a leading international supplier of medical and hygiene products. Our employees take a holistic view on healthcare and focus on the direct benefits for patients and professionals. Our aim is to meet the increasing challenges of the healthcare industry and improve the quality of life for as many people as possible. We are proud of this, and even after more than 200 years, are constantly looking for new, innovative solutions and continuous improvement.

Cooperation and a culture of open exchange within the Group are the basis for our daily work and success. We are successful when we enjoy the trust of all interest groups, e.g. patients, healthcare professionals, associations, regulatory authorities, journalists and investors. In order to strengthen this

trust in the long term, all employees and business partners of the HARTMANN GROUP are committed to the highest standards of integrity and ethics.

Due to the diversity of our products and the global orientation of the HARTMANN GROUP, it is necessary to consider the international requirements for the Group as a whole and for each country organisation as well. In addition to the legal requirements, ethical principles and our social responsibility as a company are crucial.

These central ideas are part of our Code of Conduct. It reflects what the HARTMANN GROUP expects from you as an employee, customer, supplier or business partner, while at the same time outlining our mission, values and obligations. It defines how these are to be applied in practice and provides important guidance.

If you have any questions about compliance – even if they seem trivial – you should seek advice and help. You can contact your Local Compliance Officer at any time. You will also find further contact persons in our Code of Conduct.

Our daily actions at the HARTMANN GROUP should always be in accordance with the requirements of the Code of Conduct. Collectively, will build upon your and our compliant behaviour – to ensure we do it the right way.

Heidenheim, July 2024

**Britta Fünfstück**  
Chief Executive Officer  
HARTMANN GROUP



“HARTMANN takes its responsibility for employees, customers and society very seriously – we stand for ethically correct and compliant conduct.”



## Our Code of Conduct: Duties and Responsibilities

### 01. SOCIAL RESPONSIBILITY

Our commitment to the common good is reflected in the socially and ethically responsible actions of each individual. We support charitable initiatives and programmes as well as organisations that promote environmental protection and other charitable goals in the countries in which we are represented, thereby increasing social stability.

As a manufacturer and supplier of medical devices and related services, we contribute to improving the health and satisfaction of our patients. We are committed to providing safe and high-quality products.

In our relations with patients, healthcare professionals and public authorities, we value comprehensive transparency and

integrity, as well as ethical conduct. Our actions are based on local, national and international laws in the respective country of the companies of the HARTMANN GROUP.

In compliance with these principles, we apply the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD). The HARTMANN GROUP is a member of the United Nations Global Compact (UN Global Compact). We also expect our suppliers to comply with these standards. We believe in our products and services and pride ourselves on our impeccable conduct in our dealings with medical and scientific communities.

#### Our actions are based in particular on the following regulations:

Universal Declaration of Human Rights by the United Nations (UN)

Fundamental Conventions by ILO (Core Conventions)

International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work

UN Convention on the Rights of the Child

Code for Sustainability of BVMed



## 02. RELATIONSHIPS WITH OUR EMPLOYEES

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The work performance, ingenuity and commitment of HARTMANN employees are among our most important assets. They are the driving force behind our high-quality products and lay the foundation for the satisfaction of our patients and for our corporate vision.

“Harassment and discrimination are not tolerated at HARTMANN.”

A good working environment is the basis for successful work. Trustful cooperation, fairness and the respectful way we treat each other as colleagues characterise our corporate culture. We provide a safe working environment and promote the skills and expertise of our employees.

We respect the rights and individuality of our employees. We promote diversity in the workplace and provide a safe and attractive working environment. This means that we do not tolerate harassment or discrimination under any circumstances and fully support equal opportunities and fair compensation.







### 03. COMPLIANCE WITH ANTI-CORRUPTION LAWS AND ETHICAL STANDARDS

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Bribery and corruption of any kind are not tolerated at HARTMANN. We comply with all applicable anti-corruption laws and ethical standards domestically and abroad, such as the provisions of the German Criminal Code or the UK Bribery Act. We also expect our business partners, such as distributors, sales agents or intermediaries, to comply with applicable anti-corruption and other ethical standards.

### 04. RELATIONSHIPS WITH HEALTHCARE PROFESSIONALS

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Cooperation with healthcare professionals and employees of healthcare organisations is essential to our business. A legitimate business interest is a mandatory requirement for any of our interactions with healthcare professionals.

“HARTMANN does not tolerate bribery or any form of corruption – we do business the right way!”



A close-up photograph of a man with short, dark hair and blue eyes, wearing a white shirt. He is holding a white marker and drawing a line on a whiteboard. The background is slightly blurred, showing a modern office environment with a lamp and a window.

“HARTMANN strives to be better than the competition – and we always play by the rules.”

## 05. FAIR COMPETITION

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Anti-competitive agreements, conducts or practices will not be tolerated at HARTMANN. We respect the provisions of competition law and comply with them.

## 06. CONFLICTS OF INTEREST

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When professional and private interests intermingle, objective decision-making can quickly be impaired. To prevent adverse effects on our company, all conflicts of interest must be made transparent. The compliance organisation is the right contact for this.

“Conflicts of interest arise when professional and private interests overlap – transparency is key.”

## 07. PRIVACY AND DATA PROTECTION

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The aim of data protection is to protect personal data. In the context of our business activities, customers also entrust us with particularly sensitive data, e.g. health data. Careless handling of personal data can violate the rights of the data subject and result in reputational damage and sanctions. When processing personal data, we always ensure that we comply with the legal basis.

“The trust of our business partners and employees is the basis for our success – the processing of their data is carried out in accordance with the legal provisions.”

Each employee should act in accordance with the following principles with regard to data protection:

- The data subjects affected by the processing are informed transparently.
- Personal data is accurate, up-to-date and only collected to the extent necessary to achieve the business purpose.
- Personal data is processed for a specific purpose and in accordance with the law.
- Sufficient technical and organisational security measures must be taken to prevent unauthorised use, loss or damage.
- Information shall only be kept as long as it is relevant for the purpose of the processing and permitted by law.

## 08. INFORMATION SECURITY

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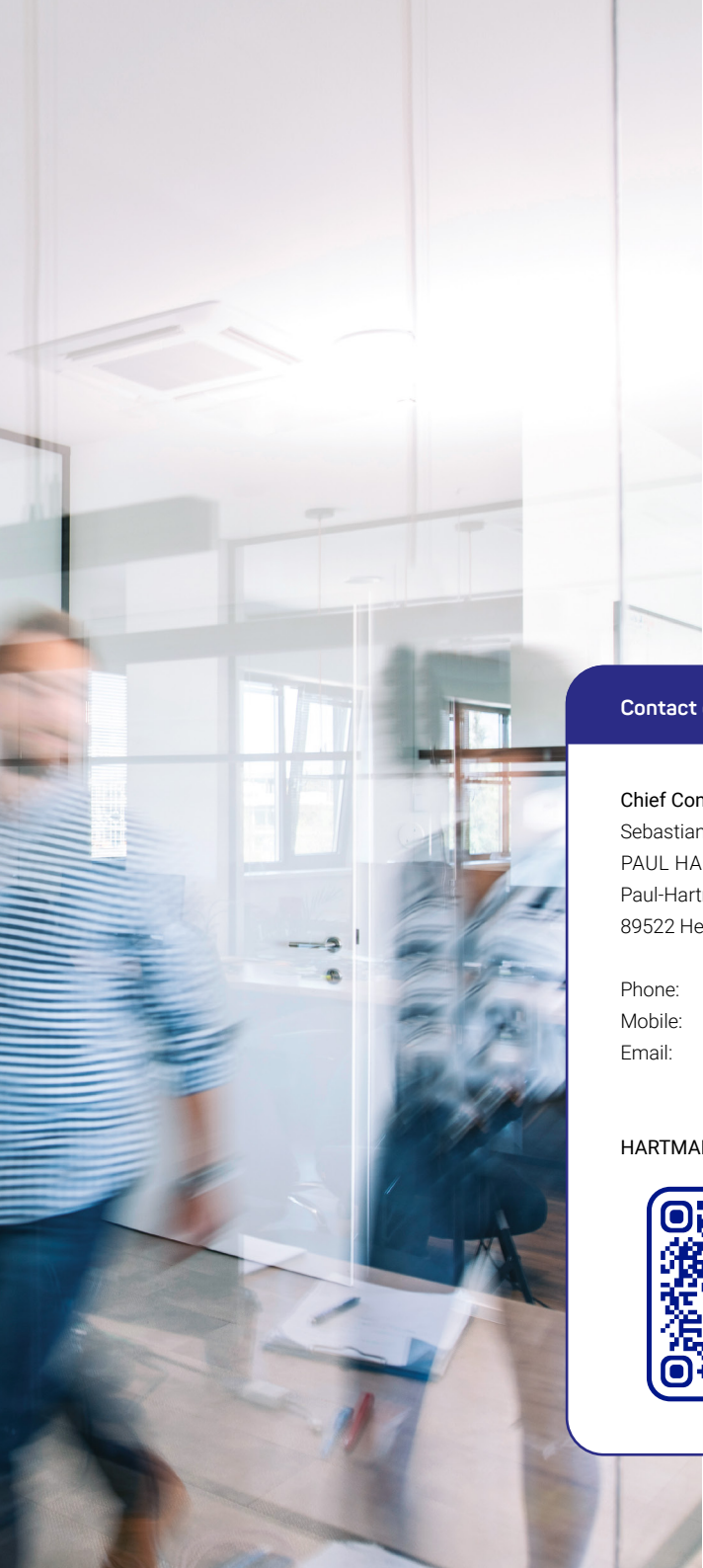
HARTMANN has established an Information Security Management System (ISMS) and has implemented appropriate technical and organisational security measures – based on international standards – to ensure the confidentiality, integrity and availability of information and data within the HARTMANN GROUP at all times.

We handle all information and data according to their information classification and ensure that confidential and strictly confidential information, data and documents are always protected effectively from unauthorised access.

The HARTMANN information security principles are laid down in the Information Security Processes.







#### Contact details:

##### Chief Compliance Officer

Sebastian Grünewald  
PAUL HARTMANN AG  
Paul-Hartmann-Straße 12  
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Mobile: +49 (0) 162 245 27 69  
Email: reporting@hartmann.info

HARTMANN Integrity Channel:



## 09. RAISING COMPLIANCE CONCERNS

Our Code of Conduct is binding for all employees of the HARTMANN GROUP. All employees are responsible for preventing possible violations, to draw attention to them and to react accordingly.

If you become aware of a situation that may involve a violation of our Code of Conduct or any applicable laws or regulations, you should raise your concerns – anonymously if desired – to the following persons:

- Your Local Compliance Officer
- The Chief Compliance Officer
- The Ombudsperson in the respective country (if appointed)

We do not only encourage our employees to address violations to us, but also our business partners and other external parties.

The identity of the person providing the information and of other persons named in the report will be treated confidentially. Employees and external parties can report violations of rules or laws at HARTMANN via our [HARTMANN Integrity Channel](#).

Whistleblowers are protected from reprisals (e.g. termination of employment, warning, demotion) based on reporting or disclosure. This also applies to threats and attempts of reprisals.

“HARTMANN supports a speak-up culture – don’t be afraid to ask questions or raise concerns.”

## 10. CONSEQUENCES IN CASE OF MISCONDUCT

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All employees and business partners of the HARTMANN GROUP are committed to the highest standards of integrity and ethics. A violation of our standards can have serious consequences for HARTMANN or individual employees, e.g. reputational damage, fines or even imprisonment.

HARTMANN therefore does not tolerate any violations of the Code of Conduct and applicable laws or regulations. Depending on the circumstances of the individual case, a violation may result in a number of serious consequences.





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This Code of Conduct applies to PAUL HARTMANN AG and all its subsidiaries worldwide.