

Guideline for Business Partner Corporate Social Responsibility (CSR) & Compliance Third Party Code of Conduct for Socially Responsible, Ethical, Legally Compliant, and Sustainable Conduct in Global Business Relationships and Supply Chains

Preamble

Our global operations are based on integrity, conscientiousness, compliance, sustainability, transparency, fairness, and respect.

Responsible, social, ethical, human rights-compliant, and environmentally friendly action is an integral part of our corporate culture and the basis for trusting cooperation with our Business Partners.

This Business Partner Guideline / Third Party Code of Conduct (hereinafter referred to as the Guideline) sets out the essential requirements that we impose on companies, organizations, and individuals that supply us with goods, software, technology, or services, provide services to us, represent us, act as intermediaries for us, advise us, or otherwise cooperate with us ("Business Partners").

The Guideline is based on internationally recognized standards and principles, in particular the principles of the UN Global Compact, the United Nations Guiding Principles on Business and Human Rights, the core labor standards of the International Labour Organization (ILO), the Sustainable Development Goals of the United Nations, and the requirements for responsible corporate governance, compliance, data protection, information security, product responsibility, and sustainable supply chains.

Our Business Partners undertake to comply with the principles set out in this Guideline, to take appropriate organizational measures to implement them, and to work towards corresponding compliance within their own supply and value chains. This Guideline is designed as a globally applicable minimum standard for cooperation with Business Partners of the Richard Wolf Group. It must be applied in accordance with the applicable local, national, regional, and international legislation. If local legal requirements provide for stricter or more stringent requirements, these must take precedence. To the extent that this Guideline contains more stringent requirements than the respectively applicable law, the requirements of this Guideline must be complied with to the extent permitted by law.

Violations of applicable law, this Guideline, or comparable compliance, human rights, environmental, or safety requirements may materially impair the business relationship and result in appropriate action up to and including termination of the collaboration.

1 Scope and liability

This Guideline applies to all business partners of Richard Wolf worldwide, irrespective of their function, registered office, place of provision of services, applicable law, or form of cooperation. "Richard Wolf" includes Richard Wolf GmbH and all companies of the Richard Wolf Group.

The Business Partner shall ensure that its management, employees and subcontractors, vicarious agents, and other third parties employed by it are aware of and comply with the requirements of this Guideline that are relevant to them.

Compliance with this Guideline is the essential basis of the business relationship. It does not release a Business Partner from any further legal, regulatory, or contractual obligations. Insofar as this Guideline is part of an agreement, its requirements apply in addition to the contractual obligations of the Business Partner.

2 Putting people at the heart of our work – human rights and working conditions

2.1 Prohibition of physical, psychological, and sexual violence

Our Business Partners do not tolerate any form of inhumane treatment, corporal punishment, insults, or threats, nor do they tolerate any attempts to deprive employees of their freedom of communication and movement within their organization or within their business partners' organizations. This includes any form of psychological pressure as well as physical, sexual, or verbal abuse, intimidation, and harassment.

2.2 Human rights

Our Business Partners respect the personal dignity, privacy, and human rights of each and every person, support internationally recognized human rights and do not tolerate any human rights violations.

2.3 Prohibition of child labor, forced labor, slavery, and human trafficking

Our Business Partners do not tolerate any child, forced or punitive labor, slavery, modern slavery, or human trafficking, either in their organizations or in the organizations of their business partners. Employment must always be voluntary. Business Partners may not retain identification documents, charge unreasonable agency fees, or take any other measures that effectively prevent employees from terminating their employment.

2.4 Equal opportunities and non-discrimination

Our Business Partners observe the basic principles of equal opportunity when selecting and promoting their employees. They do not discriminate against employees on the basis of age, physical or mental disability, ethnic origin, physical appearance, skin color, gender, pregnancy, sexual orientation, nationality, religion, marital or civil status, or on the basis of any other factors. Personnel decisions should be based exclusively on factual criteria such as qualification, performance, experience, and suitability.

2.5 Freedom of association and expression

Our Business Partners respect the right of their employees to freedom of association and expression in accordance with applicable laws. Disadvantage or preference due to membership in employee representative bodies or trade unions is not permitted.

2.6 Fair working conditions

Business Partners guarantee fair working conditions and comply with the applicable labor, social security, and wage regulations. Employment models must not be used to circumvent legal protection regulations.

2.7 Health and safety at work

Our Business Partners ensure compliance with the applicable health and safety labor laws, rules, and regulations in force and provide safe and healthy working conditions for their employees. In addition, they support the continuous enhancement of occupational health and safety measures and systems and carry out workplace risk assessments. At the same time, they ensure that every employee observes all occupational health and safety regulations in their area of work.

2.8 Customer orientation, service and quality management

Our Business Partners are committed to high quality standards, reliable performance, and the continuous improvement of their products, components, materials, software, services, and processes. They ensure that their services meet the agreed requirements and contribute to supporting the safety, quality, and performance of the products and services offered by Richard Wolf. Business Partners promote a customer- and service-oriented way of working, take into account the requirements of relevant stakeholders, and strive to continuously improve their quality and performance processes. Insofar as their services can have an impact on patients,

users, or customers, they contribute to ensuring high standards of quality, safety, and reliability within the scope of their responsibilities.

3 Business ethics and compliance

3.1 Compliance with the law

In all business transactions and decisions, our Business Partners comply with the applicable laws and other relevant regulations of the countries in which they operate. Unlawful conduct will not be tolerated. Detected violations must be adequately investigated, rectified, and prevented in the future by appropriate preventive measures.

3.2 Compliance management

Our Business Partners maintain appropriate and risk-based organizational measures to ensure compliance with applicable laws, regulatory requirements, contractual obligations, and this Guideline. This includes, in particular, clear responsibilities, internal regulations, control mechanisms, training, documentation requirements, and procedures for identifying, assessing, avoiding, and remedying compliance risks. Business Partners shall ensure that identified violations are adequately investigated and remedied and that necessary corrective and preventive measures are implemented.

3.3 Fair and respectful conduct

All cooperation is based on fair and respectful conduct. We value mutual trust and respectful communication. Business Partners behave professionally, respectfully and with integrity towards employees, customers, patients, users, authorities, competitors, and other third parties. Emergency situations, dependencies, or information asymmetries of employees, business partners, or other third parties may not be exploited.

3.4 Fair competition

Our Business Partners observe the principles of free and fair competition. This includes complying with all applicable antitrust regulations, rules of competition, and other laws and legal provisions in their country as well as all corresponding international regulations. In particular, agreements or concerted practices with competitors about prices, price components, discounts, margins, costs, customers, markets, territories, tenders, sources of supply, production volumes, delivery quotas, strategies, or other competition-relevant parameters are prohibited. This also applies in the context of trade fairs, association meetings, working groups, benchmarking activities, and other contacts with competitors.

3.5 Anti-corruption

Our Business Partners do not practice or tolerate any form of corruption, giving or receiving bribes, accepting or granting undue advantage, extortion, embezzlement, or other serious misconduct. In particular, the active or passive granting, claiming, accepting, or promising of unlawful benefits is prohibited. This applies regardless of whether benefits are granted directly or indirectly, through intermediaries, to private individuals, companies, public officials, healthcare professionals, health institutions, or other decision-makers.

3.6 Collaboration with healthcare professionals and healthcare institutions (HCP/HCO)

Business Partners who work with healthcare professionals (HCPs), healthcare organizations (HCOs), or other healthcare stakeholders comply with applicable legal, regulatory, professional, and industry-specific requirements. In particular, benefits, allowances, or other services that are suitable for inadmissibly influencing business, medical, scientific, or procurement decisions are inadmissible. Remuneration, sponsorship, consulting, or training services must be lawful, reasonable, transparently documented, and justified by a legitimate purpose. Business Partners also support compliance with applicable transparency and disclosure requirements.

3.7 Money laundering prevention, financial integrity, and tax compliance

Our Business Partners do not engage in or support money laundering, terrorist financing, tax evasion, fraud, embezzlement, or other financial crimes. Payments may only be made on the basis of proper, comprehensible, and actually provided services. Cash payments, payments to non-business-related accounts, payments to uninvolved third parties, or payments in high-risk countries are only permitted if there is a legitimate, documented, and comprehensible business reason for this. Business Partners maintain full, accurate, and transparent business records, statements, and records. Business transactions must not be concealed or misrepresented. Any form of balance sheet, document, or proof manipulation is not permitted.

3.8 Export controls, sanctions, and embargoes

Our Business Partners comply with all applicable regulations concerning export controls, sanctions, embargoes, terrorist financing, dual-use goods, and the import and export of goods, software, technology, services, and information. In particular, they shall ensure that no improper transactions are conducted with sanctioned persons, organizations, companies, countries, or other listed parties. Business Partners shall immediately report if risks, restrictions, or approval requirements under export control law, sanctions law, or embargo law exist or arise in connection with the business relationship. Business Partners may not use structures or transactions that serve to circumvent sanctions, embargoes, or export control regulations. Information on beneficial owners must be disclosed on request.

3.9 Data protection, confidentiality, and information security

Business Partners protect personal data, confidential information, and trade secrets and comply with applicable data protection, confidentiality, and information security regulations. They take appropriate technical and organizational measures to protect information, IT systems, and data from unauthorized access, loss, alteration, or disclosure. Information security, data protection, or cybersecurity incidents, vulnerabilities, or other security events that may have an impact on Richard Wolf, the business relationship, or affected data must be reported immediately. Insofar as personal data is processed on behalf of the customer, this shall be done exclusively on the basis of a separate data protection agreement. Known or suspected information security incidents, cyberattacks, vulnerabilities, unauthorized access, data outflows, or other security events with a possible impact on Richard Wolf or the business relationship must be reported immediately to

psirt@richard-wolf.com.

3.10 Cyber security and digital security

Business Partners who provide or operate IT systems, software, cloud services, digital services, interfaces, maintenance services, remote access, networked products, or other digital components ensure appropriate cybersecurity measures over the entire service period. This includes, in particular, appropriate vulnerability management, access controls, logging and monitoring measures, protection against malware, secure development and change processes, measures for availability, integrity, and confidentiality as well as procedures for handling security incidents. Known or suspected security gaps, cyberattacks, unauthorized access, data outflows, or other security incidents with a possible impact on the business relationship must be reported immediately. Business Partners may only use remote access, interfaces, administration rights, or other privileged accesses after prior coordination, limited to the necessary extent and under appropriate security precautions. Known or suspected information security incidents, cyberattacks, vulnerabilities, unauthorized access, data outflows or other security incidents with a possible impact on Richard Wolf or the business relationship must be reported immediately to psirt@richard-wolf.com.

3.11 Artificial intelligence and automated systems

Business Partners who use artificial intelligence or comparable automated systems ensure that they are used responsibly, safely, transparently, and in accordance with the applicable legal and regulatory requirements. The use of such systems must not affect the rights of persons or the safety, quality, integrity, or compliance of the services they provide. Adequate human supervision, risk controls, and protective measures must be ensured.

3.12 Product safety, quality, and regulatory requirements

Business Partners comply with the legal, regulatory, technical, and quality requirements applicable to their products, services, and their respective roles. Insofar as their services have an impact on medical devices, medical software, or other regulated products, they support compliance with the relevant requirements for quality, safety, traceability, market surveillance, and vigilance. Quality defects, safety risks, regulatory deviations, and other circumstances that may affect the safety, conformity, or marketability of products or services must be reported to Richard Wolf immediately.

The Medical Device Regulation (EU) 2017/745 as well as the international medical device standard ISO 13485:2016 pursue a high level of protection for patients, users, and third parties and contain requirements for quality, safety, market surveillance, and vigilance; in particular, manufacturers as well as other international economic operators are obliged to record and report incidents and safety corrective measures in accordance with local and international legal requirements.

4 Business ethics – transparency

4.1 Conflict of interest

Our Business Partners make decisions relating to business activities with other business partners purely on the basis of objective criteria. There must be no conflicts of interest with personal, business, or other activities, including those involving family members or other closely associated persons.

4.2 Identifying concerns

Our Business Partners encourage their employees to report in confidence any concerns, complaints, or potentially unlawful activities in the workplace or in the context of business activities without threat of reprisal, intimidation, or harassment and provide them with appropriate means to do so. Our Business Partners investigate such reports and take corrective action as and when required.

4.3 Intellectual property and trade secrets

Our Business Partners and their employees protect the intellectual property, business secrets, confidential information, and know-how of the customer and respect the intellectual property of third parties. This includes, for example, development results, drawings, patents, trademarks, and other industrial property rights, copyrights, designs, commercial secrets, samples, models, and other forms of expertise. No products, components, software, materials, or services may be supplied that infringe the rights of third parties or whose use is unlawful.

5 Environmental, energy, and material compliance

5.1 Energy savings/management

Our Business Partners strive to reduce energy consumption, conserve resources, and limit environmental impact in order to continuously improve energy-related performance. They take appropriate measures to continuously improve their energy- and resource-related performance, insofar as this is possible taking into account their business activities, size, and risk situation. If possible, our Business Partners work with an energy management system in accordance with ISO50001 and support us in their actions by providing us with energy-related information that is as detailed as possible.

5.2 Environmental and climate protection

Our Business Partners consider the legal requirements for environmental protection as a minimum standard and urge their employees and business partners to go beyond these minimum requirements. They strive to use resources efficiently, reduce energy consumption, reduce greenhouse gas emissions, avoid waste, promote a circular economy, and use environmentally friendly materials to the extent that is technically, regulatory, and economically feasible. Our Business Partners are committed to effectively reducing carbon emissions resulting from our business activities.

5.3 Substance bans, substance restrictions, and material compliance

Our Business Partners comply with all applicable requirements for substance bans, substance restrictions, as well as labeling, information, registration, and documentation obligations. This includes, in particular, requirements for hazardous substances, chemicals, packaging, waste, electrical and electronic products, batteries, conflict minerals, persistent or particularly concerning substances, as well as other material- or product-related environmental requirements and the continuous safeguarding of associated obligations, insofar as these are relevant for the delivered products, materials, or services. This includes proactively and regularly reporting to us any modifications that need to be made.

To protect life on land and underwater (biodiversity), we opt for environmentally friendly materials wherever possible and always in accordance with regulatory requirements. Our Business Partners support us in this through their actions. Upon request, our Business Partners provide full, accurate, and up-to-date information, evidence, declarations, and documentation on material compliance. Changes, risks, deviations, or findings that may have an impact on the marketability, conformity, or sustainability assessment of the products or materials supplied must be communicated immediately.

5.4 Packaging, product stewardship, and sustainable supply chains

Our Business Partners comply with all laws, rules, and regulatory requirements applicable to their business activity in relation to packaging, packaging waste, product stewardship, extended producer responsibility (EPR), environmental and sustainability requirements, and supply chain due diligence. These include, in particular, requirements from regulations on packaging and packaging waste (e.g. EU Packaging and Packaging Waste Regulation (PPWR)), extended producer responsibility (EPR), as well as sustainable and deforestation-free

supply chains (e.g. EU Deforestation Regulation (EUDR)), where applicable. Business Partners comply with legal obligations applicable to their respective roles, provide required information, evidence, declarations, registrations, and registration numbers in a full, accurate, and timely manner, and support compliance with applicable environmental, product, and supply chain requirements. We must be notified immediately of any changes to packaging, packaging materials, raw materials, or products that may have an impact on conformity, registrations, product specifications, sustainability requirements, or the lawful marketing or provision of products. Insofar as products, materials, or raw materials are subject to special environmental, sustainability, or supply chain-related due diligence and verification obligations, Business Partners provide the information and documents required to meet these requirements in a full, correct, and timely manner.

6 Supply chain, due diligence, and subcontractors

6.1 Supply chain

Our Business Partners are encouraged to communicate the guiding principles and standards set out in this document to their business partners through similar agreements, or to enter into equivalent agreements with them. This is intended to ensure compliance with these guiding principles and standards along the supply chain and to continuously improve the associated processes, including those of our Business Partners' subcontractors.

6.2 Subcontractors

Our Business Partners may only use subcontractors or other third parties if they are technically suitable, reliable, and obliged to comply with the relevant legal, regulatory, contractual, and compliance-related requirements. In the event of identifiable risks or violations within their own supply chain, Business Partners take appropriate prevention, remedial, and control measures and inform us immediately if the business relationship may be affected.

7 Whistleblower protection and reporting of violations

Our Business Partners provide appropriate reporting channels or procedures through which employees and, where appropriate, third parties can confidentially report indications of possible violations of law, human rights or environmental violations, compliance violations, or violations of this Guideline. Whistleblowers must not experience discrimination, intimidation, disciplinary action, dismissal, degradation, threat, or other reprisal on the basis of a bona fide report. Business Partners investigate reports carefully, objectively, and confidentially and take appropriate remedial and preventive action as and when required. Insofar as violations or risks affect or may affect the business relationship, they must be reported immediately via the designated channels.

Contact in the event of violations or concerns:

compliance@richard-wolf.com

8 Self-regulation and monitoring

8.1 Processes and compliance

Our Business Partners ensure that their employees are informed about and comply with the contents of this Guideline and the resulting requirements. Richard Wolf respects the fact that compliance with and implementation of the guiding principles and standards set out in this Guideline is an ongoing process. We therefore ask our Business Partners to continuously review and improve their standards and processes.

8.2 Monitoring and obligation to provide evidence

Our Business Partners appropriately document compliance with the requirements of this Guideline and retain relevant evidence in accordance with legal and contractual requirements. On justified grounds or on the basis of risk, appropriate information, self-disclosure, evidence, certificates, guidelines, audit reports, or other documents may be requested insofar as these are necessary to verify compliance with this Guideline. If there are concrete indications of violations or significant risks, a review or audit can be carried out by the Business Partner itself or by commissioned third parties after prior notice and with due consideration for the legitimate confidentiality and security interests of the Business Partner.

8.3 Remedial and preventive measures

If a Business Partner becomes aware of, or receives notice of, a violation of applicable law, this Guideline, or similar requirements, it must promptly take reasonable steps to investigate, terminate, mitigate, and prevent future violations. In the event of violations or significant risks, the submission of an appropriate action plan may

be required. The action plan must contain the identified risks or violations, the planned remedial and preventive measures, responsibilities, and an appropriate implementation schedule. Upon request, the Business Partner must report on the progress and implementation of the agreed measures.

Contact details in the event of violations

If our Business Partners encounter a potential violation of applicable law or of the contents of this Guideline in their cooperation with us, we request that they contact us at the following address: compliance@richard-wolf.com

8.4 Consequences of violations

A breach of applicable law, this Guideline, or comparable compliance, human rights, environmental, data protection, information security, quality or regulatory requirements may constitute a significant violation of the business relationship. Appropriate action may be taken depending on the nature, severity, and extent of the violation. This includes, in particular, the request for further information or evidence, the performance of additional tests, the agreement on remedial and preventive measures, the temporary suspension of individual services or orders, as well as the restriction or termination of cooperation.

9 Confirmation

The Business Partner confirms that it has received, read, and understood this Business Partner Guideline / Third Party Code of Conduct. The Business Partner undertakes to comply with the requirements contained therein, to take appropriate measures to implement them, and to pass on the relevant content to employees, subcontractors, and other third parties insofar as they act in connection with the business relationship.

The Business Partner also confirms that it will report immediately if it becomes aware of any material violations, risks, or circumstances that may impair compliance with this Guideline or the business relationship.

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Place, date, legally binding signature, company stamp