



beurer

CODE OF CONDUCT
- BEURER GROUP -

CONTENTS

Our understanding of sustainability	4, 5
Our responsibility as a member of society	6, 7
Human Rights	8
Equal opportunities and treatment	8
Product quality and safety	8
Environmental protection	8, 9
Donations, Sponsorship and Charity	9
Communication and Marketing	9
Our Responsibility as a Business Partner	10, 11
Conflicts of Interest	12
Prohibition of Corruption	12
Prohibition of Money Laundering and Terrorist Financing	12
Anti-competitive practices	12
Taxes and Customs	13
Compliance with Export Controls	13
Sustainable procurement	13
Our responsibility in the workplace	14, 15
Health and safety	16
Feedback culture	16
Data protection	16
Security & asset protection	16, 17
IT Security	17
Compliance with the Code of Conduct	18
Scope of application	18
Implementation	18
Communication and training	18
Help / Contact / Whistleblowing System	18

Where reference is made in the following to the „Beurer Group“, this also refers to the consolidated companies of the Beurer Group which operate under their own brand in the respective markets. The use of the terms „Beurer“ and „Beurer Group“ is merely for linguistic convenience. Note: For reasons of readability, the masculine form is used. All genders are included equally.



OUR UNDER- STANDING OF SUSTAINABILITY

The Beurer Group is a medium-sized, international family-owned company from Germany that stands for products that improve people's health and well-being. Together with our stakeholders, we are committed to integrity, mutual trust and open communication to ensure our long-term success. We are aware of our social responsibility and have integrated sustainability into our corporate strategy.

We want to contribute to an inclusive and sustainable economy that benefits all people, communities and markets. That is why we have joined the UN Global Compact and have committed ourselves to the 10 principles of sustainable business. These ten universally accepted principles in the areas of human rights, labour standards, environmental protection and anti-corruption are based on:

- The Universal Declaration of Human Rights
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
- The principles of the Rio Declaration on Environment and Development
- The UN Convention against Corruption

The purpose of this Code of Conduct is to implement behaviours to meet our responsibilities as a member of society, as a business partner and in the workplace, and to contribute to sustainable development.



OUR RESPONSIBILITY AS A MEMBER OF SOCIETY

We are aware of our social responsibility and want to have a positive impact on society. We are committed to ensuring that our products meet the highest standards and have firmly embedded sustainability in our corporate strategy. As a company, we want to help ensure that future generations will also find an environment worth living in.

Every employee is called upon to be aware of his responsibility and to contribute to sustainable development in his daily actions. Specific principles in the following areas result from our overall social responsibility:

- Human rights
- Equal opportunities and treatment
- Product quality and safety
- Environmental protection
- Donations, sponsorship and charity
- Communication and marketing

HUMAN RIGHTS

Background:

Every human being is entitled to human rights. They apply equally to all human beings. However, nowhere in the world is there a guarantee that human rights will not be violated, and even democratic constitutional states do not offer absolute protection against abuse. As an international company, we must therefore pay particular attention to ensuring that human rights are respected and protected in all our business relationships.

Principle of behaviour:

We protect, respect and promote globally applicable rules and laws based on the United Nations Universal Declaration of Human Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms. We act in accordance with the three pillars of freedom, equality and solidarity and reject all forms of child, forced and compulsory labour. We expect our employees, business partners and suppliers to protect and respect human rights. We therefore urge you to actively oppose modern slavery and human trafficking, including child and forced labour, and encourage you to openly address any human rights concerns you may have. As a member of amfori, we also place particular emphasis on respecting human rights in our supply chain and have a responsibility to uphold our commitments.

EQUAL OPPORTUNITIES AND EQUAL TREATMENT

Background:

Discrimination occurs when individuals or groups are directly or indirectly disadvantaged because of their ethnic origin, gender, sexual identity, age, disability or religion. Bullying, stalking, sexual harassment and psychological and physical violence also violate the principles of equal opportunity and equal treatment and must therefore be prevented.

Principle of behaviour:

We provide equal opportunities for all and protect our employees from all forms of discrimination. Our employees, business partners and suppliers are selected on the basis of their qualifications and skills and not on the basis of their personal background or personal characteristics. We apply the principle of equal opportunity and equal treatment in the development and promotion of our employees. We encourage you to be

proactive and to report any suspicion of discrimination immediately to the designated body.

PRODUCT QUALITY AND SAFETY

Background:

As a manufacturer of products for health and well-being, the quality and safety of our products - especially medical devices - are of paramount importance. With the European Medical Device Regulation (MDR) coming into force, the importance of product quality and safety has increased even further, making a quality management system essential for companies.

Principle of behaviour:

The health and well-being of our customers is our top priority. To live up to this principle, we produce innovative products that are at least state of the art and comply with legal and regulatory requirements in product development. We also believe it is our responsibility to minimise risks and harm to the health of our customers and the environment throughout the entire product lifecycle.

ENVIRONMENTAL PROTECTION

Background:

Climate change, the resulting increase in natural disasters and resource scarcity are key challenges of our time. Mankind must act to limit global warming to 1.5°C in order to ensure a viable future for future generations. Global companies have a major responsibility in this regard, as they have a significant impact on the environment.

Principle of behaviour:

As a global company, we have a special responsibility for the environment. The environmental performance and sustainability of our products and locations are important to us, and we strive to continuously reduce the environmental impact of our business activities. We want to contribute to sustainable development and are committed to applying a sustainable mindset in all areas of our business. For us, this means integrating sustainability into product development and ensuring that materials are recovered at the end of their life cycle. We encourage you to adopt resource-efficient working practices and to take the initiative to get involved in local activities. Only together can we make the transformation to a sustainable business and promote the health of our planet.

DONATIONS, SPONSORSHIP AND CHARITY

Background:

Donations are voluntary services for which no consideration is given in return. Sponsorship is a donation of money, goods and services that is intended to be reciprocated. Both donations and sponsorship are a sensitive issue in the area of corruption and thus require special attention.

Principle of behaviour:

We are an active member of society and recognise our social responsibility. We use donations and sponsorship only within the framework of local laws and the internal policies. Therefore, we ask you to follow the internal approval process for donations and sponsorship and not to make donations that could damage our reputation. We do not make financial contributions to political parties, individual elected officials or candidates for political office.

With the Beurer Foundation, we are actively involved in society and use the profits of our company to support ongoing projects for the benefit of children, youth and women, in order to fulfil our social responsibility and have a positive influence on society.

COMMUNICATION AND MARKETING

Background:

For companies, public appearances are key to announcing new products or corporate information. Communication and marketing can be used to manage the perception of a company internally and externally. However, in some areas of social and environmental sustainability, this tool is often misused to mislead customers and portray themselves to the public as being particularly environmentally friendly & socially just.

Principle of behaviour:

We provide clear and trustworthy communication to all stakeholders and handle corporate information responsibly. We communicate in a way that reflects our values and ensures an honest and consistent public image. We therefore encourage you to communicate in accordance with internal guidelines and to coordinate public statements on behalf of the company with the marketing department.

In the area of sustainability, we are committed to transparent disclosure of our sustainability and social performance and reject any form of misleading information to prevent customers from making poor purchasing decisions based on misinformation. We ensure that customers receive only reliable and transparent environmental information about our products.



OUR RESPONSIBILITY AS A BUSINESS PARTNER

In all our business relationships, we focus on integrity, mutual trust and fairness. Our responsibility as a business partner means that we comply with the legal framework and consistently implement and communicate internal policies. We aim to go beyond the minimum legal requirements and to act with integrity as a business partner. We therefore condemn any kind of economic crime and take internal measures to prevent and detect such activities.

Every employee is required to comply with the law and internal policies in all business relationships. Our responsibility as a business partner gives rise to specific principles in the following areas:

- Conflicts of interest
- Prohibition of corruption
- Prohibition of money laundering and terrorist financing
- Fair and free competition
- Taxes and customs duties
- Compliance with export controls
- Sustainable procurement

CONFLICTS OF INTEREST

Background:

A conflict of interest occurs when a member's personal interests potentially compete with or contradict the interests of Beurer. For us as a company, an unresolved conflict of interest can have negative consequences and lead to economic damage or loss of image.

Principle of behaviour:

We make business decisions in the best interests of the company and avoid conflicts between personal and business interests from the outset. However, we recognise that conflicts of interest cannot always be avoided. Such situations can lead to business decisions that are detrimental to both the employee and the company. In such a situation, you are encouraged to disclose the conflict of interest transparently and inform your manager so that a solution can be found through open discussion.

PROHIBITION OF CORRUPTION

Background:

Corruption occurs when entrusted power is abused for private gain or advantage. It is a global problem that can occur in all economies and economic systems. Corruption is punishable by law and leads to high damages for companies. It distorts competition and can cause significant financial and reputational damage to us as a company.

Principle of behaviour:

We have a zero-tolerance policy on corruption and comply with all applicable laws. As a signatory to the UN Global Compact, we actively support the fight against corruption and punish corruption in all its forms. We provide benefits to business partners, customers or other external third parties only within the legal framework and defined guidelines. We carefully consider internally whether to offer or accept gifts or hospitality. In principle, gifts and hospitality are permitted to maintain business relationships. However, we ask that you only offer or accept gifts or hospitality

if it is business-related. These principles apply to our company's activities as well as to third parties acting on our behalf.

PROHIBITION OF MONEY LAUNDERING AND TERRORIST FINANCING

Background:

Money laundering is the process of introducing illegally obtained money into the legal economic cycle. Terrorist financing refers to the funding of terrorist activities and can come from legitimate or criminal sources. Allegations of money laundering or terrorist financing can cause lasting damage to our reputation and result in financial and criminal penalties.

Principle of behaviour:

We support the international community in the fight against money laundering and terrorist financing and comply with all legal obligations. We only do business with reputable partners who operate within the law. We therefore urge you never to knowingly facilitate money laundering or terrorist financing and to take steps to prevent the Beurer Group's business activities from being inadvertently used for these purposes. We also urge you to report any unusual or suspicious activities or transactions. In general, cash transactions should not be made.

ANTI-COMPETITIVE PRACTICES

Background:

Anti-competitive practices are business practices that unlawfully prevent or restrict competition in a market. To combat anti-competitive practices, antitrust law prohibits agreements between companies that have the purpose or effect of restricting competition. Violations of antitrust law can have far-reaching consequences for the Beurer Group as well as for private individuals. Fines, civil liability, criminal prosecution and enormous damage to the company's image may result.

Principle of behaviour:

We are committed to the principles of fair competition and make individual decisions on pricing and product offerings based on our experience and knowledge of the market. We comply with antitrust laws and discourage any form of collusion to restrict competition. We urge you never to share market-sensitive or confidential information and to participate fully in antitrust training.

TAXES AND DUTIES

Background:

As a global company, we are subject to numerous tax and customs laws and regulations. In order to avoid irregularities that could lead to significant financial and reputational damage, it is essential that taxes and duties payable are fully identified and paid to the relevant tax authority on time.

Principle of behaviour:

We comply with all national and international tax and customs obligations. We rely on the principle of tax compliance to maintain the trust of the authorities. We therefore urge you to comply with tax regulations and to pay all taxes and duties payable in full and on time to the relevant authorities. Our implemented Tax Compliance Management System ensures that we comply with local tax laws and meet all tax obligations.

COMPLIANCE WITH EXPORT CONTROLS

Background:

Export controls apply to all goods, services, software and technology transferred within a country, between countries or between nationals. The legal framework for trade regulates the export and import of goods and services. As a global business, it is important to comply with the applicable export control laws and to observe any prohibitions, restrictions or other controls.

Principle of behaviour:

We comply with applicable laws and regulations governing the import and export of goods, services, software and technology, and encourage you to comply with foreign trade regulations. We comply with applicable trade laws, do not export products to embargoed countries and do not make our products available to prohibited end-users. We expect the same commitment and compliance from our business partners.

SUSTAINABLE PROCUREMENT

Background:

As globalization makes supply chains more complex, social and environmental risks increase. Many products and raw materials are produced or extracted under intolerable environmental and working conditions, for very low wages or even using child or forced labour. International companies are therefore increasingly required to take appropriate measures to improve working and production conditions in their supply chain. For example, there are legal requirements for companies to both protect human rights along their global supply chain and reduce their environmental impact.

Principle of behaviour:

As a signatory of the UN Global Compact and as a member of amfori, we see it as our duty to support human rights, fair working conditions and environmental protection in our supply chain and to fight against all forms of corruption. For this reason, we strive to source our raw materials, goods and services only from suppliers who act in a socially and environmentally responsible manner in order to minimise risks in our supply chain. Our supplier and material selection decisions are based not only on economic criteria, but also on social, environmental and ethnic criteria.

A close-up photograph of several orange ants crawling on a dark, textured tree branch. The background is a soft, out-of-focus green, suggesting a natural, outdoor setting. The lighting is bright, highlighting the details of the ants and the branch.

OUR RESPONSIBILITY IN THE WORKPLACE

It is important to us that our employees feel comfortable in their workplace. We therefore promote the health of our employees and ensure that their workplace is safe and secure. We are also committed to protecting our stakeholders' data, as well as the company know-how and assets.

Every employee is required to handle the data of business partners as well as the company's own information with care and to comply with the applicable laws.

Our responsibility in the workplace gives rise to specific principles in the following areas:

- Health and safety
- Feedback culture
- Privacy and data protection
- Security and asset protection
- IT security

HEALTH AND SAFETY

Background:

Companies can only be successful if their employees are efficient, motivated and innovative. It is not enough for employees to have the necessary qualifications and individual skills to perform high-quality work. It is equally important that employees are healthy and feel safe in their working environment. This is the only way to ensure that employees are motivated, identify with the company and can contribute to its success in the long term.

Principle of behaviour:

We provide our employees with a healthy working environment and a safe workplace that exceeds the minimum legal requirements. We comply with the legal and technical standards for occupational health and safety and make the protection of our employees an integral part of our corporate culture through our comprehensive occupational health and safety management system. We see it as our responsibility to look after the physical, mental and social health of our employees. By doing so, we create a positive and safe working environment in which our employees feel comfortable. Therefore, we ask you to follow the safety guidelines and to avoid situations that could cause harm to yourself or other colleagues.

FEEDBACK CULTURE

Background:

An open feedback culture is essential to ensure continuous improvement within our organization.

Principle of behaviour:

We are open and honest with each other. We encourage the exchange of opinions and speak openly. This feedback culture enables us to continually develop and grow together. We also deal openly with mistakes and try to learn from them. We therefore encourage you to be honest with your colleagues and to speak up about mistakes.

DATA PROTECTION

Background:

As the world goes digital, data is becoming increasingly important to businesses and it is vital that it is handled correctly. In virtually every country, the collection, use and storage of personal data is regulated by law. Failure to comply with these laws and regulations can result in fines, loss of image and damage to reputation.

Principle of behaviour:

We treat personal data responsibly and confidentially and process it in accordance with applicable laws. We protect confidential information from unauthorised access and misuse and ensure that we comply with legal requirements. All privacy principles are embedded in our internal policies and communicated to employees through training. We therefore urge you to attend the training sessions carefully, to familiarise yourself with the applicable rules and to be aware and careful when handling personal data. If you have any questions, please contact the data protection manager to clarify how to proceed in specific individual cases.

SECURITY & ASSET PROTECTION

Background:

A company's assets are everything the company provides to get the job done. This includes tangible assets such as the premises and equipment, as well as intangible assets, such as the know-how of every employee. Assets are therefore of immense value to businesses and protecting them is fundamental to long-term success.

Principle of behaviour:

We treat the tangible assets of the Beurer Group carefully and sustainably and use them only for official purposes. We handle internal company information, intellectual property and trade secrets responsibly, as they are of great value to us. We urge you not to share information

with others that could provide unauthorised insight into our business operations. Sharing this information can be damaging to us, which is why we use non-disclosure agreements where appropriate to restrict the use, disclosure and distribution of this information.

IT SECURITY

Background:

IT security is the protection of information to prevent the manipulation of data and systems by unauthorised third parties. Information security is defined by the three objectives of availability, integrity and confidentiality. This means that information is only made available to certain authorised people, that data is always complete and correct, and that data processing within IT systems runs smoothly.

Principle of behaviour:

We secure our IT infrastructure against manipulation and unauthorised access and apply strict information security standards to protect the information of our company and our business partners. We urge you to be sceptical of all emails from unknown external senders and not to divulge any sensitive information without verifying the sender. We comply with all applicable rules and regulations, as well as internal policies.

COMPLIANCE WITH THE CODE OF CONDUCT

SCOPE OF APPLICATION

This Code of Conduct with its binding principles of behaviour applies to all employees of the Beurer Group. The specific principles as well as other specific guidelines and rules must be implemented by every employee in his daily work. We also expect our business partners to be aware of the principles and to comply with these principles.

IMPLEMENTATION

We are committed to helping you implement the principles of the Code of Conduct. Only by living and breathing the Code of Conduct can we ensure that we meet our responsibilities as a member of society, as a business partner and in the workplace. In some situations, it may be difficult to do the right thing. But if you follow this Code of Conduct, you will be on the right track.

In addition to the Code of Conduct, there are individual policies on topics covered by the Code of Conduct that we have deemed essential based on a risk analysis. For example, we have already implemented internal guidelines on the topics of antitrust and competition law, data protection and tax law. We reserve the right to add further topics to our existing compliance management system to include further topics.

COMMUNICATION AND TRAINING

The effectiveness of such a compliance management system can only be assessed if we train you on the issues. For this reason, we have implemented a central training platform in the form of a Learning Management System and communicate the Code of Conduct as well as the applicable rules and laws in the form of employee training.

It is important to us that the Code of Conduct is adequately communicated both internally and externally. For this reason, the Code of Conduct can be found on our website at the following link:

www.beurer.com/gb/code-of-conduct

Internally, you should also be informed about the Code of Conduct as early as possible. We have therefore integrated the Code of Conduct into the onboarding process so that you are informed when you join the company. In addition, the Code of Conduct is available on the intranet so that you can refer to it if you are unsure about a particular situation or have any questions.

HELP / CONTACT / WHISTLEBLOWING SYSTEM

The first point of contact for questions or concerns about the Code of Conduct is always the supervisor.

Complaints and suggestions regarding the Code of Conduct can also be directed to the appropriate office. If you become aware of a violation or misconduct, you can contact our reporting office in confidence:

esgfeedback@beurer.de



