



Version 1.0 März 2020

Verhaltenskodex - Code of Conduct

MEDICE Gruppe

Schaper & Brümmer GmbH & Co. KG

I. Purpose

Schaper & Brümmer GmbH & Co. KG is part of the MEDICE Group - an owner-managed, fast-growing, international pharmaceutical company that is constantly expanding into new business areas and markets. With our product portfolio, we stand for a long-term and sustainable business policy. One of our greatest and most valuable strengths is that, despite our growth, we remain a family business that protects its employees, who work for us every day with a high level of responsibility.

As a pharmaceutical company, it is particularly important for us to treat our employees, patients, customers, and partners correctly and decently. After all, our products are only accepted if we enjoy the trust of patients, doctors, and pharmacists. Therefore, business integrity is the key to sustainable growth, securing employment, and preserving our corporate culture.

This Code of Conduct sets the standard of internal regulations for our national and international business activities within the framework of legal regulations and industry standards that are binding for MEDICE.

The Code of Conduct serves as a guideline for our behaviour in our daily business. It provides that each individual employee, each manager, and each managing director of MEDICE takes the responsibility for his or her actions and behaviour. Even if individual sections of this Code of Conduct are highlighted as being particularly important for employees in certain areas of the company, all employees must familiarise themselves with these sections as a matter of principle and observe them to the required extent.



II. Principle Agreement

All employees are obliged to adhere to applicable laws and industry standards that are binding for MEDICE and internal company regulations within the scope of their activities. The legal requirements may differ in the various divisions and activities of the employees.

MEDICE puts a lot of emphasis on the training of employees in the areas of activity relevant to their work.

MEDICE strives for responsible business conduct in all areas of the company.

If there is any doubt within the applicable rules or in previously unregulated areas as to whether a certain conduct is legally permissible, employees should contact their superiors, the legal department, or a compliance officer, or refer the matter to the department responsible for internal guidelines or policies.

Respect for People and the Environment

III. Mutual Appreciation

Especially important for employees in all areas of the company.

MEDICE appraises diversity in its workforce. The diversity of cultures, languages and ideas in the company can be a competitive advantage, and it can contribute to the long-term survival of the entire company organization.

MEDICE operates in countries with different cultures. This diversity does not always only bring advantages, but requires careful management to avoid and resolve any misunderstandings and conflicts that may arise. An open and humanly-decent interaction between employees is a prerequisite for the joint success of all parties involved.

MEDICE is committed to fair and equal treatment of all employees in matters of individual development and advancement.

MEDICE does not tolerate any form of discrimination or harassment at work.

IV. Protection of the Environment and Health

Particularly important for employees in all areas of the company.

A high priority for MEDICE is the protection of employees, customers, and service providers from health hazards and the environment from harmful inputs. As an industrial company that works with various chemical compounds on a daily basis and operates a large number of facilities and machines for this purpose, MEDICE puts a lot of emphasis on the continuous improvement of its manufacturing processes. In this way, accidents



at work are prevented, harmful emissions into the environment are prevented, and customers and patients can be sure that MEDICE's products meet the highest quality requirements.

Occupational safety is a top priority at MEDICE. All employees have to stick to the applicable regulations for their own protection and that of their colleagues. This does not only apply at the workplace itself, but also in road traffic on the factory premises. Suggestions for improvement from employees are welcome and help MEDICE to master new and unknown challenges.

The best way to protect the environment is to use resources economically - conserved materials save budgets and do not burden the environment at all.

Integrity, Quality and Competition

V. Personal Integrity

Particularly important for employees in all areas of the company.

Personal integrity is a prerequisite for trustful cooperation with colleagues, customers, suppliers, and other business partners.

Business activities of relatives and related persons for MEDICE can lead to conflicts of interest. Employees shall not participate in any decision that could cause their own interests and those of relatives or related persons to conflict with the interests of MEDICE.

Employees shall not abuse employment with MEDICE to obtain unjustified personal benefits or advantages for relatives or persons close to them.

In particular, when dealing with employees of other companies, members of the medical profession, and employees of government agencies, specific legal and industry-specific regulations apply to benefits and invitations. Compliance with these regulations is mandatory.

Company resources and facilities must always be used for the success of the company and not for personal benefit.

VI. Quality

Especially important for employees in: Production & Engineering, Medicine, and Regulatory Affairs.

Maintaining high pharmaceutical quality standards contributes decisively to regulatory compliance and is a prerequisite for our business activities. MEDICE is committed to compliance with legal and regulatory requirements as well as internationally recognised standards - e.g. Good Clinical Practice (GCP), Good Pharmacovigilance Practice (GVP), Good Distribution Practice (GDP) and Good Manufacturing Practice (GMP) - and aims to meet the high expectations of its stakeholders regarding the quality, safety, and efficacy of its products and services.



Patient safety and the consistent investigation of all complaints (medical and pharmaceutical-technical complaints) have the highest priority.

All employees are regularly trained to immediately report all side effects/events, other risks, and customer complaints to the relevant department. Quality reports are collected on all MEDICE products, regardless of whether they are reports on medicinal products, medical devices, biocides, cosmetics, or food.

VII. Protection of Free and Fair Competition

Particularly important for employees in: Purchasing, Marketing, Sales, Market Access, International Markets.

Only in a fair and competitive environment, can good ideas prevail, and patients and customers can benefit from improved and/or cheaper products. Laws against restrictions of competition (e.g. cartels and monopolies) or unfair business practices serve to protect consumers as well as honest companies. Violations can result in severe fines for MEDICE and the employees involved.

Agreements and practices that hinder competition are not permitted.

MEDICE's advertising measures are subject to an internal approval process in order to identify the main risks from unfair advertising and to deal with them appropriately.

VIII. Handling Narcotics

Particularly important for employees in: Production & Technology.

MEDICE stores, processes, and distributes substances that fall under the local Narcotics Act. The regulations of the Narcotics Acts and the associated ordinances provide the binding framework for the proper handling of the substances covered therein. Violations of these regulations can have serious consequences for the employees involved. In addition, MEDICE is threatened with severe fines and a loss of reputation if narcotics are handled carelessly.

Therefore, employees must strictly adhere to the legal requirements and the internal instructions for the handling of narcotics.



X. Prevention of Terrorism and Money Laundering

Particularly important for employees in: Finance, Controlling, Sales, International Markets, and Purchasing.

MEDICE ensures careful selection and ongoing monitoring of business partners. This is necessary to prevent terrorist financing and money laundering, to secure receivables, and to protect the good reputation of our products and our company itself. For this purpose, "Know Your Customer/Vendor" (KYC/KYV) processes, including the maintenance and use of embargo lists, general terms and conditions, and special contractual regulations have been established. This is of particular importance in foreign business. Cross-references to corruption prevention, e.g. in dealing with politically exposed persons (PEP), are taken into account.

X. Confidentiality Obligations

Particularly important for employees in all areas of the company.

MEDICE is an innovative company. Our future success stands and falls with the development of innovative products and novel marketing/sales concepts. This success is at risk if internal information falls into the wrong hands. This also applies if confidential information of our partner companies is improperly disclosed to third parties.

All information that is not already publicly available and not intended for publication must be treated confidentially and verifiably protected against unauthorized access by means of suitable technical, organizational and legal safeguards.

Before discussing content with potential new partners, whether on the supplier, development or sales side, a non-disclosure agreement must be concluded. No business transaction can be so urgent that this intermediate step can be dispensed with.

Salzgitter, den 23.10.2023

Dr. Uwe Baumann

Nils Ole Wolcke