

CODE OF CONDUCT

OUR VALUES AND
PRINCIPLES OF BEHAVIOUR

www.miethke.com



MIETHKE CODE OF CONDUCT

Our Code of Conduct describes our company culture as being legally compliant and socially responsible actions of each individual at Christoph Miethke GmbH & Co. KG.

No Code of Conduct can constitute a complete catalogue of all duties and legal norms; rather, it is a foundation. This Code of Conduct, which we voluntarily commit to uphold, is a pledge to our customers and partners and serves all of us as a guide for our daily interactions based on shared values, statutory and legal regulations as well as internal rules.

Potsdam, 31/07/2020

Christoph Miethke
Managing Director

GENERAL

We respect valid laws everywhere and act responsibly, ethically and with dedication. For us, that means not only complying conscientiously with laws and statutes, but also upholding values such as respect, social responsibility, democratic values, sustainability and treating others both inside and outside the company as equals.



1

HUMAN DIGNITY IS INVIOABLE

We are committed to tolerant, respectful, fact-based and fair dealings with one another and externally.

“Human dignity is inviolable” (Art. 1 of the German constitution). For us, that is not just a fundamental element of democracy – it is a part of our company philosophy. We respect each individual’s personality and reject all forms of discrimination. No-one may be treated either more or less favourably, harassed or marginalised due to their nationality, ethnic background, skin colour, age, appearance, gender, disability, sexual identity, religion/worldview or for any other reason that is an affront to human dignity. This applies to us in our personal interactions as well as all other communicative, digital and social channels we use. Our employees make a concrete commitment to working in a manner that honours this principle and treats others as equals.

Violations of this principle must be reported to the immediate supervisor, the head of Human Resources or the management.



2

CONFLICTS OF INTEREST

We take care to prevent our own interests from conflicting with the company's interests.

Conflicts of interest arise in cases where our own interests are contrary to those of the company. Specifically, that means that we do not abuse our positions for personal purposes or to gain an unfair advantage over third parties, and we are uncompromisingly loyal to the company.

In order to avoid personal risk in terms of conflicts of interest or the appearance thereof, we discuss each potential conflict of interest with our supervisor or our compliance officer, who can make a decision about how to handle this potential risk:

compliance@miethke.com



3

DATA PROTECTION

Protecting the personal data of our employees, business partners and customers as well as of third parties is of great importance to us.

We commit to maintain the confidentiality of personal data and to collect, process and store it only in a manner that is consistent with valid data-privacy laws.

For more information, please see our privacy policy. Our data protection officer will be happy to answer all your questions about data protection: datenschutz@miethke.com



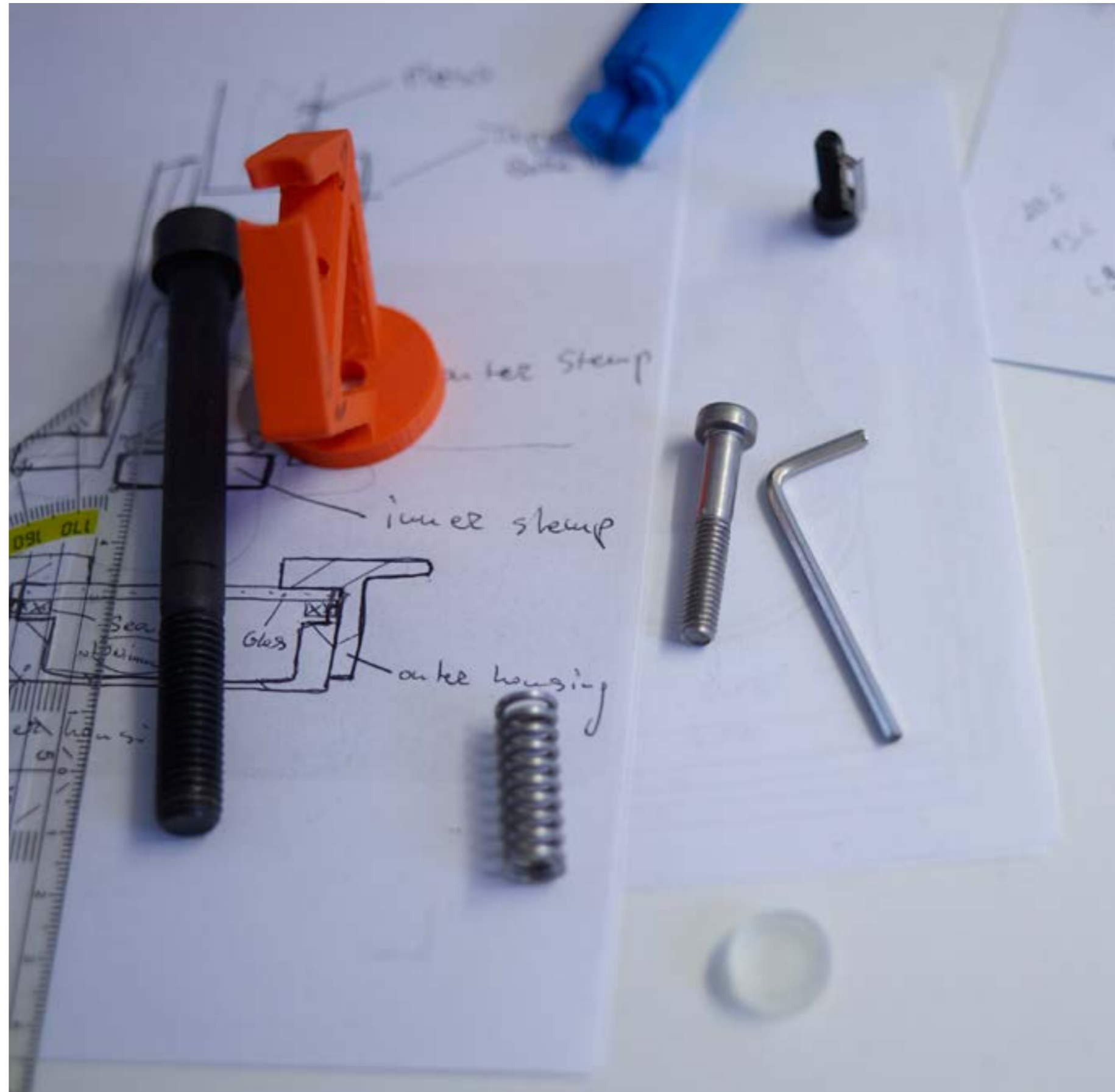
4

COMPANY PROPERTY

We protect our company's property, assets, know-how and trade secrets.

Data, know-how, patents, all information relating to our company and work materials are the property of the company and are of substantial value to it. For this reason, we protect our trade secrets in all areas of the business from access by third parties – personally and by applying appropriate processes, instructions and internal guidelines – and we handle all our company's assets with care.

Our compliance officer will be happy to answer all your questions about company property: compliance@miethke.com



5

FAIR COMPETITION

We are committed to fair and honest behaviour towards competitors as well as towards customers, partners, patients, authorities, employees and colleagues.

We acknowledge fair competition with no restrictions and approach the tasks and challenges associated with it in a fair and open manner. We trust in the ability of our products' and services' quality and functionality to pass muster and we categorically reject any unfair or anti-competitive market influence – particularly collusive behaviour with business partners that is designed to impede free competition.

Our compliance officer will be happy to answer all your questions about competition/antitrust law: compliance@miethke.com



6

NO TO CORRUPTION, BRIBERY, AND ACCEPTING OR GRANTING ADVANTAGES

We do not grant any unlawful or unjustified advantages nor do we accept any.

Bribery and corruption are prohibited, will not be tolerated by us, and are completely contrary to our corporate culture. We strongly oppose any practice of exerting undue influence on business decisions.

None of us is permitted to request, accept, offer, or grant any personal advantage in connection with our work.

This includes money, goods or services, as well as other unjustified advantages such as the giving or acceptance of gifts of inappropriate value and/or for an inappropriate reason. No business transaction justifies breaking the law or violating our company values.

In order to avoid personal risk in terms of bribery or corruption or the appearance thereof, we discuss each potential risk with our supervisor or our compliance officer, who can make a decision about how to handle this potential risk.

Our compliance officer will be happy to answer all questions about corruption: compliance@miethke.com



7

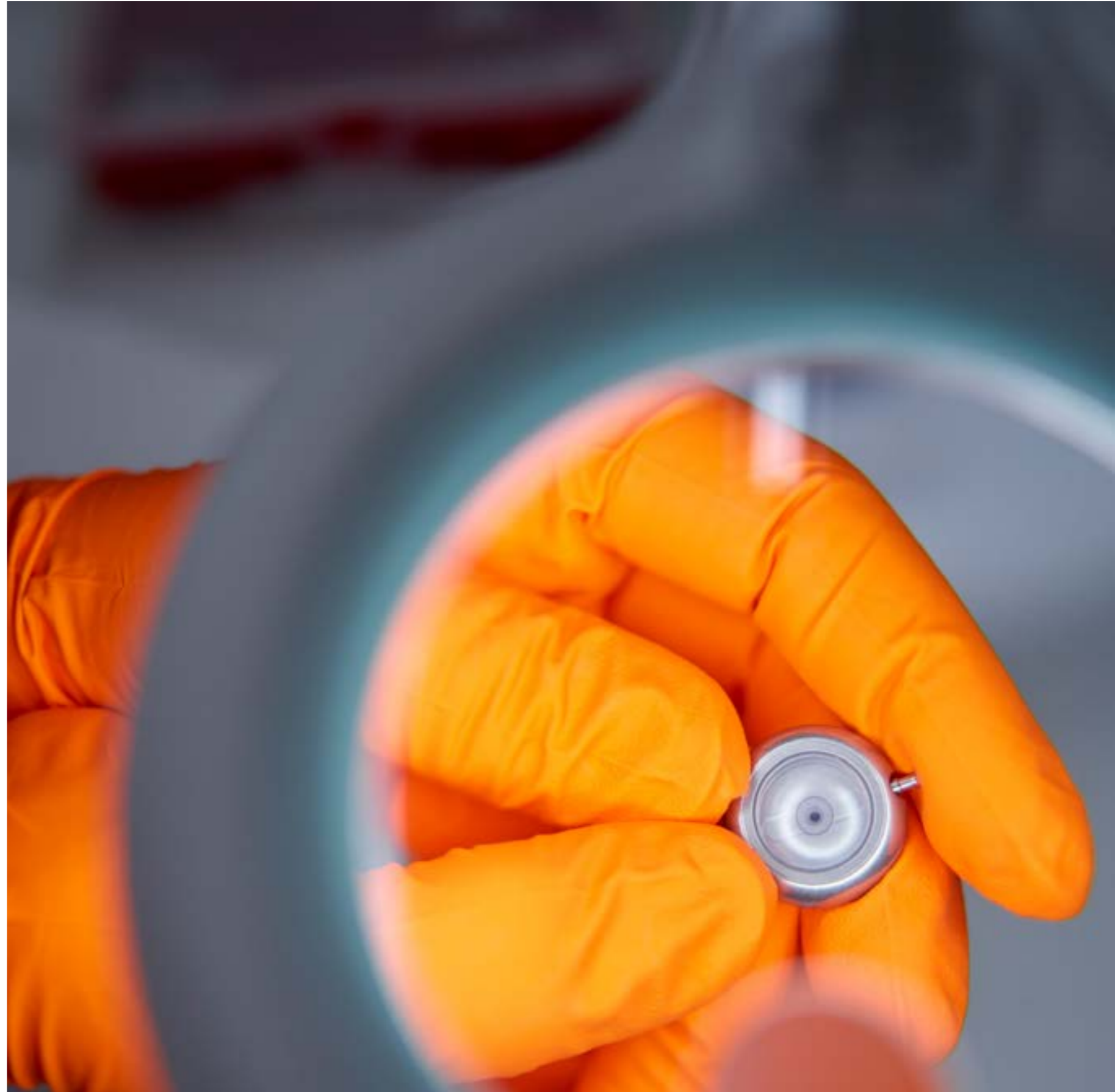
PRODUCT SAFETY AND QUALITY

We develop, manufacture and sell medical products, always aspiring to exceed the state of the art in terms of functionality, safety and quality.

Patient safety is our number one priority in the development and manufacture of our products. Patients and customers can always trust that our products comply with the prescribed safety and quality regulations and that our own standards of functionality, safety, service and quality are an additional impetus driving us to take particular responsibility and care every day. Our internally and externally audited quality management system ensures that all quality standards are met and any complaint, no matter how minor, is taken up and checked in a thorough and prompt manner and the underlying cause rectified.

Our medical products consultants can answer all your questions about our products at: info@miethke.com

Our quality officer, Jörg Knebel, can answer all your questions about quality management: jörg.knebel@miethke.com



8

WORK SAFETY

For us, protecting our employees by providing them with a safe workplace environment is the foundation for good working conditions, and something we consider standard.

Our safety officer supports our company management and department heads so that our employees can work unimpeded in a safe and healthy working environment. The safety officer trains all employees in all aspects of work safety and, together with the department heads, monitors compliance with work safety regulations.

Our work safety officer will be happy to answer all your questions about work safety: arbeitssicherheit@miethke.com



9

ENVIRONMENTAL PROTECTION

For us, environmental protection is part of social responsibility, which we wholeheartedly accept.

We are well aware of our responsibility to protect the environment and the climate for present and future generations. For us, conducting business sustainably is an ongoing process which we examine carefully in all areas of the company and improve continuously. Our environment team – made up of employees from all areas of the company – works actively on new solutions.

Our environment officer will be happy to answer all your questions about environmental and climate protection as well as sustainability, whether from in-house or external sources: umwelt@miethke.com



10

EXPORTS AND PROHIBITION OF MONEY LAUNDERING

We observe all export and trade restrictions, always ensuring that potential money-laundering activities have no place in our distribution chain.

As an internationally operating company, we are committed to abiding by all measures necessary to combat organised crime and potential financing of terrorist activities. We conduct business exclusively with legally compliant business partners and observe all domestic and international customs, export and foreign-trade regulations.

We renounce in the strongest terms activities that serve or create the appearance of serving to introduce assets from criminal activity into the legal financial and economic cycle while disguising their true source, as well as all other types of money-laundering activity at home and abroad.

Our customs officer will be happy to answer all your questions about customs, exports and trade restrictions: zoll@miethke.com



ORGANISATION AND PROCESSES

Our company management, department heads, employees and compliance officer are committed to implementing our Code of Conduct in our company processes and to improving it on an ongoing basis.

Any doubts about our correct actions may and must be addressed to our Compliance Officer Tabea Gerlach at any time by all persons - internal and external - who come into contact with them:

Questions about compliance are best addressed here: compliance@miethke.com.

Information about possible compliance violations can be submitted anonymously or by providing contact data for queries and answers to our Compliance Officer.

The contact form of the [whistleblower system](#) on our homepage is available for this purpose.

The tips are treated confidentially and reported to the management, which decides on necessary measures (training, process adjustments, etc.).

Potsdam, 31/07/2020

Tabea Gerlach
Compliance Officer

Christoph Miethke
Managing Director



**TABEA
GERLACH**

Compliance Officer
compliance@miethke.com



Manufacturer: Christoph Miethke GmbH & Co KG | Ulanenweg 2 | 14469 Potsdam | Germany
Tel. +49 331 62 083-0 | Fax +49 331 62 083-40 | www.miethke.com

