



Code of Business Conduct



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BIOTRONIK Group Code of Business Conduct - Foreword



Foreword

"Integrity is doing the right thing, even when no one is watching." (C. S. Lewis)

At BIOTRONIK, the well-being of patients always comes first. Preserving life and improving patients' quality of life has been our drive for more than 50 years.

We all work day after day to implement and fulfill our guiding principle "excellence for life". "Excellence for life" means for us: To always give our best for highest QUALITY. For our patients and customers.

To manufacture products of the very highest reliability to ensure the SAFETY of patients at all times. To work continuously to develop innovative and unique SOLUTIONS and to provide our customers with proven, excellent SERVICE.

Our success depends on everyone being committed to our values and our guiding principle of "excellence for life".

Together, these values define our culture and guide us in our daily interactions with customers, patients, business partners and employees. Our Code of Conduct is designed to support these values and further promote honesty, transparency and integrity as pillars of our corporate culture.

The Code of Conduct sets out how we act as a company and serves as a guide for business decisions. It also helps to identify ethically questionable business behavior, properly address concerns and seek advice - behavior that is essential for a transparent, honest and integrity-oriented corporate culture.

Each of us must familiarize ourselves with the Code of Conduct and follow it in a binding manner. In doing so, we live our values and justify the trust that patients, business partners and customers place in us.

Therefore, please internalize our Code of Conduct and personally act accordingly.

BIOTRONIK Group Code of Business Conduct - **Foreword**



We thank you very much for your support!

Berlin, October 2022 BIOTRONIK Executive Management Board

Dr. Alexander Uhl Chief Executive Officer

Volker Lang

Senior VP Research & Development CRM

Gregor Zwinge

Senior VP Operations CRM

Stephan Schulz 7 Chief Financial Officer

Jörg Pochert President VI

BIOTRONIK Group Code of Business Conduct - Introduction



1 Introduction

It is one of the most important traditions of our company to align our business activities with the highest moral and ethical standards. BIOTRONIK's impeccable reputation throughout the world for lawful and ethical conduct is one of the company's most important assets. This is something we can be proud of. The BIOTRONIK Code of Business Conduct is intended to inform employees and representatives of the company of their legal and ethical obligations. The Code helps define our values and should be used as a reference to help you make the right decisions and resolve legal and ethical issues you may encounter.

The Code applies to all BIOTRONIK representatives, including all employees, officers (i.e., managerial employees), directors, as well as contractors or other agents that are contractually bound by BIOTRONIK. Each of us is responsible for understanding and complying with the BIOTRONIK Group Code of Business Conduct (the "Code").

All BIOTRONIK employees, contractors, or other agents are required to:

- Comply with all applicable laws, Industry Codes and the Code;
- Have a basic understanding of the Code and review it from time to time;
- Have a detailed knowledge of provisions that specifically apply to their job;
- Complete required education and further training.

All BIOTRONIK directors and officers are required to:

- Comply with all applicable laws and the Code;
- Know the Code in detail and actively promote it in the workplace;
- Maintain knowledge of applicable laws and regulations;
- Lead by example and act as a role model by following high standards, and creating a work environment reflecting the content and the spirit of the Code;
- To fully support employees in implementing the requirements of the Code at all times;
- Be vigilant in preventing, detecting, and responding to any violations of the Code;
- Protect those who report violations in good faith.

We all share responsibility for reporting and addressing violations of the Code. The Code prohibits retaliation against anyone who raises a concern, and we are committed to fostering an environment that encourages people to raise concerns. If you see a possible violation of the Code, you should tell your supervisor, your local compliance representative, or to the Corporate Compliance department directly.

BIOTRONIK Group Code of Business Conduct - **Our** Company



Further details about the general principles set out in this Code are provided in specific policies that address particular situations or applicable laws. If a local law or policy conflicts with our Code, you should contact the Corporate Compliance department.

Please note that this Code is not intended to be exhaustive and is subject to changes in legislation and recent case law. The Corporate Compliance department in Berlin (corporatecompliance@biotronik.com) will be happy to assist you should you have any questions about the Code or interpreting it.

2 Our Company

BIOTRONIK is a leading global medical technology company. Its goal is to develop new, custom, and highly reliable treatments to meet the needs of sick people and the medical requirements of future cardiology practice. At BIOTRONIK, we devote each and every day to incorporating our **vision of "excellence for life"** in everything we do. For us, this means we always give our best to achieve the highest levels of QUALITY. We manufacture products of the highest reliability to ensure the SAFETY of patients at all times. We continuously work to develop innovative and unique SOLUTIONS and to provide our customers with proven, excellent SERVICE. The goal of our work is to save LIVES and improve patients' quality of life.

Our Purpose: Our Mission:

To perfectly match technology with the human body to advance health and well-being for all people.

One Second. One Life.

We envision a world in which our technology saves, extends, or improves one life every second.

Our continued success and reputation are the result of our ongoing and consistent adherence to the highest standards of conduct. After all, we can only maintain BIOTRONIK's commitment to quality products and standards if we adhere to the ethical business conduct. Our patients, employees, business partners, and all other stakeholders not only place their trust in us to provide products and services of the highest quality, but they also trust us when we say that honesty, integrity, and respect for human rights, as well as the interests of our employees in our day-to-day business are of the utmost importance to us.

BIOTRONIK Group Code of Business Conduct – **Our** Core Values and Customer Promise



3 Our Core Values and Customer Promise

The BIOTRONIK Core Values help us in our goal to develop high-quality products and services that promote the health of all people and improve their quality of life, thereby also ensuring that BIOTRONIK has a successful, sustainable future. Our values reflect our organizational culture and serve as a compass for how we think and act as a global player.



4 Our Self-conception

BIOTRONIK is committed to a respectful working collaboration in the workplace as well as fair and safe working conditions.

4.1 Respect for Human and Labor Rights

BIOTRONIK Group Code of Business Conduct - **Our** Business Behavior



BIOTRONIK respects human rights and implements fair working conditions. In doing so, we comply with applicable laws and follow the principles of the United Nations Universal Declaration of Human Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

Furthermore, we strive to conduct our business safely, while prioritizing the health and safety of our employees, as well as our business partners and their personnel who support us in our business activities, and those people who live and work in the areas surrounding our sites. We foster a corporate culture in which everyone takes responsibility for minimizing risks and promoting safety precautions.

4.2 Inclusion and Diversity

We value inclusion and diversity, which is why people of all backgrounds and identities are welcome at BIOTRONIK. We can only make the most of our possibilities and raise our performance levels and innovative strength when all BIOTRONIK employees welcome this diversity and contribute their individual experiences, talents, and perspectives.

4.3 Discrimination- and Harassment-Free Workplace

BIOTRONIK supports the provision of equal opportunities for its employees and will not tolerate discrimination or harassment of any kind in the workplace. No one shall be discriminated against as a result of gender, age, disability, race, ethnic origin, religion or ideology, or sexual orientation. Discrimination, harassment, and insults will not be tolerated.

5 Our Business Behavior

BIOTRONIK promotes a culture of honesty, transparency, and integrity. Ensuring that these principles are anchored in the way in which we conduct business is key to the trust that patients, business partners, and other stakeholders have in us.

5.1 General Principles of Behavior

To act in a professional, honest, and ethical manner constitutes BIOTRONIK's main principle. Every BIOTRONIK representative is expected to resolutely behave both within BIOTRONIK and towards third parties with integrity, lawfulness, mutual respect, holding open and fair dialog, as well as honoring everyone's right to privacy and dignity.

Further information can be found in our **Ethics Policy.**

5.2 Fighting Corruption

BIOTRONIK Group Code of Business Conduct - **Our** Business Behavior



As a global company, we comply with anti-corruption laws and do not tolerate bribery, corruption, kickbacks, or any other improper advantage in any of our businesses involving medical professionals, public officials, business partners or other private parties.

It is forbidden to offer, authorize, or provide a payment or anything else of value with the intention of improperly influencing a person. Similarly, it is forbidden to demand, receive, or agree to receive anything of value from a person who intends to influence business decisions.

Stricter laws and regulations may apply when BIOTRONIK interacts with government entities and their employees or representatives. No perquisites, benefits, or gifts of value may ever be promised, offered, or provided to a public official to refrain from acting in conjunction with applicable laws in order to obtain or retain any business advantage. BIOTRONIK representatives who work with authorities are responsible for understanding and complying with any specific rules that apply to their activities and interactions.

The prohibition of kickback payments also applies. A hidden commission ("kickback") must be assumed when an individual or legal entity intentionally solicits, receives, offers, or pays any form of direct or indirect remuneration that constitutes a return of a proportion of the amount paid from a transaction in cash or in kind.

Further information can be found in our **Anti-corruption Policy.**

5.3 Fighting Money Laundering

BIOTRONIK complies with legal prohibitions on money laundering. In this context, the term 'money laundering' is understood to mean carrying out a transaction using assets obtained by criminal means, structuring a transaction in such a way as to circumvent a requirement to report activities that identify criminal activity, or carrying out a transaction as a continuation of criminal behavior. BIOTRONIK takes various measures (e.g., risk-based business partner screening) to ensure that business relationships are only formed with trustworthy business partners who are involved in legitimate business activities that are funded from legitimate sources.

5.4 Cartel Ban and Fair Competition

BIOTRONIK is committed to open markets and fair competition and regards this as a high asset in our society. All BIOTRONIK representatives are expected to comply with antitrust, and other applicable laws and regulations pertaining to fair competition. These laws and regulations prohibit inter alia:

BIOTRONIK Group Code of Business Conduct - **Our** Business Behavior



- Unfair trade practices, including bribery, misappropriation of proprietary information, deception, intimidation, or similar unfair practices;
- Discussions with competitors pertaining to pricing, bids, discounts, promotions, profits, costs, terms or conditions of sale, warranties, or inventories;
- Discussions and agreements with competitors to allocate customers, divide territories, or limit production;
- Discussions and agreements with competitors to refrain from doing business with a particular company or to limit doing business with a particular company.

We are an innovative medical technology company and have therefore assumed a leading role in the market in some countries or for some products. We don't exploit this economic strength but handle this market position responsibly. We neither hinder other market participants due to our market position, nor do we abuse our position to prevent new competitors from entering the market, to force existing competition out of the market or to manipulate prices.

Further information can be found in our Antitrust and Competition Policy.

5.5 Selection of Suppliers

BIOTRONIK stands for the supply of the highest quality products and services. So that these quality standards can also be guaranteed in respect of our suppliers, a number of strict requirements are placed on our suppliers and these are examined by us before co-operation. Under our Supplier Code of Conduct, we expect suppliers to maintain high ethical and business standards in their own operations and supply chains.

Further information can be found in our **Supplier Code of Conduct**.

5.6 Cooperation with Health Stakeholders

BIOTRONIK must observe and comply with special rules when working with medical professionals or health care organisations. The principles of equivalence (performance and consideration must be appropriate in respect of each other), separation (financial contributions and sales transaction must be independent of each other), transparency (cooperation/benefit must be disclosed), and documentation (all services must be appropriately documented) are all applied in this respect and, to a special degree, have a bearing on the shape of the cooperation. Regarding donations, events, research, educational grants, or consultancy services (this is not an exhaustive list), there are additional requirements that must be considered in order to maintain BIOTRONIK's integrity.

BIOTRONIK Group Code of Business Conduct - **Our** Business Behavior



Further information can be found in our **Policy on Working with Health Stakeholders**.

5.7 Regulatory Requirements for Medical Devices

In addition to the goal of manufacturing products of the highest quality, BIOTRONIK's commitment to compliance with legal and ethical requirements is also a top priority. In particular, a large number of laws and standards must be observed for the development and market launch of medical devices. Compliance with these regulations is essential for BIOTRONIK to ensure the safety and performance of our products and to justify the trust placed in us and in our products.

5.8 Conflict of Interest

BIOTRONIK's impeccable reputation throughout the world for lawful and ethical conduct is one of the company's most important assets. We therefore strive to protect our reputation and prevent any potential conflicts of interest.

Conflict of interest can be viewed as any activity that is inconsistent with or opposed to the best interests of BIOTRONIK. BIOTRONIK representatives are not to compromise their business ethics or those of BIOTRONIK at any time.

BIOTRONIK expects its representatives to use their best efforts for the company's success. BIOTRONIK representatives should not engage in any activity that could be a conflict between personal interests and BIOTRONIK's best interests, including the company's reputation. Conflicts could arise in the following circumstances:

- Consulting or (second) employment with a competitor, supplier, or customer;
- Holding a substantial financial interest in any competitor, supplier, or customer;
- Being involved in selection decisions about a contractor/supplier in which the BIOTRONIK representative has a substantial financial interest or for which a spouse or other family member works, unless the BIOTRONIK representative discloses such interests/relationships;
- Starting a competing business or pursuing any commercial opportunity that would interfere with the best interests of BIOTRONIK.

Substantial private financial dealings and/or relationships with health care professionals in the area of BIOTRONIK products by BIOTRONIK representatives may, depending on applicable law, be viewed as an indicator for an unfair business practice. This applies in particular to any activities outside the BIOTRONIK representative's official medical technology sales and/or support functions.

BIOTRONIK Group Code of Business Conduct - **Our** Information



We cooperate with partners in the healthcare sector and public authorities in many areas. We act and communicate transparently and openly in our dealings with our partners. This also applies to the acceptance of invitations and gifts. All payments, contracts, and agreements for consulting services (clinical, presentations, training) must come directly from BIOTRONIK.

In case of doubt about a conflict of interest, the BIOTRONIK representative may request clarification from their supervisor and/or the Compliance representative.

Should there be a conflict of interest, we expect it to be promptly reported. Your supervisor, together with the Corporate Compliance department, is responsible for taking appropriate action to protect you and BIOTRONIK from any decision-making processes that could be damaging or compromising.

6 Our Information

BIOTRONIK holds accurate information and data and takes appropriate preventive measures in order to protect confidential information and intellectual property.

6.1 Proper Accounting

BIOTRONIK undertakes to maintain proper accounting records so that they can comply with the legal requirements mandating complete, accurate, and timely submissions of financial reports and disclosures. This necessitates keeping accurate records in a timely manner and the retention of all records in accordance with statutory provisions.

6.2 Disclosure of Payments

Subject to applicable laws and regulations, BIOTRONIK may be required to disclose payments or other transfers of value of more than nominal value made to relevant recipients, including physicians and teaching hospitals. BIOTRONIK will fully comply with such legislation at any time, as well as with all related applicable individual statutory provisions for reporting payments.

6.3 Protecting Patient Information

BIOTRONIK adheres to all applicable data protection legislation, privacy laws, and the protection of patient health and insurance data. Personal data are any information relating to an identified or identifiable natural person.

BIOTRONIK Group Code of Business Conduct - **Our** Communication



Patient health and insurance data (patient data) include, inter alia, common identifiers such as name, address, birth date, or health insurance membership, information that relates to the patient's past, present, or future physical or mental health or condition, information that relates to the provision of health care to the individual, and information that relates to the past, present, or future payment for the provision of health care to the individual. BIOTRONIK takes all necessary and appropriate steps to protect such patient data against unauthorized disclosures.

The measures required for handling personal data are regulated in the data protection guidelines.

If you have any questions about data protection, please be sure to contact our local Data Protection Officers at any time.

6.4 Protection of Confidential Information and Commercial Secrecy

Confidential information and commercial secrecy pertaining to BIOTRONIK must always be treated as confidential and extensively protected. Commercial secrecy may include information about the product development, expertise, technology, business plans, pricing information, customer information, and financial information of the company. Private or confidential information may include trade secrets as well as information about patients or personal information regarding BIOTRONIK employees or supplier employees. Even once employment has been terminated with BIOTRONIK, the obligation to maintain confidentiality is still applicable.

6.5 Intellectual Property

Intellectual property, such as patents, trademarks, and copyrights, is one of BIOTRONIK's most important assets. The protection of intellectual property is crucial in respect of bringing innovations to market and enabling BIOTRONIK to continue to work each day to provide first-class products and services that save lives or improve patient quality of life.

We respect and protect our intellectual property and that of third parties equally, regardless of its commercial value. We use third party intellectual property and confidential information only if we have permission or other rights to do so (for example, through acquired license rights).

If you have any questions about patent law, please be sure to contact our Patent Legal department at any time.

7 Our Communication

BIOTRONIK is committed to being open, honest, and transparent in their corporate communication. We see this as a fundamental requirement for keeping the trust of our patients, customers, and other stakeholders.

BIOTRONIK Group

Code of Business Conduct - **Our** Social Commitment



7.1 Information Provided to Authorities

BIOTRONIK conducts its business in a transparent and orderly manner. We therefore provide appropriate cooperation as required regarding regulatory reviews, inspections, or investigations. If you receive a regulatory request, such as a notice to appear for questioning or a subpoena, and it is not within your area of responsibility, you should immediately notify your supervisor and the Legal department. The Legal department will coordinate any further steps to take.

Further information can be found in our **Investigation Guide**.

7.2 Use of Social Media

BIOTRONIK recognizes the benefits of social media platforms and the increasing importance of playing an active role on them. The use of social media, however, also brings with it certain risks that everyone needs to be aware of. Social media includes blogs/microblogs (e.g., Twitter), social networks (e.g., Facebook), professional networks (e.g., LinkedIn, XING),

platforms for sharing videos (e.g., YouTube) and images (e.g., Instagram), platforms for providing ratings (e.g., Kununu), and wikis (e.g., Wikipedia).

When engaging with and using social media, each user is responsible for following common courtesies and for the protection of data, confidential information, and commercial secrecy. All activity must be undertaken with a conscious knowledge of responsibility.

Further information can be found in our Social Media Policy.

8 Our Social Commitment

BIOTRONIK believes that economic success and social commitment go hand in hand. In our opinion, acting responsibly means working for the future of society worldwide.

8.1 Environmental Protection

BIOTRONIK is committed to the sustainable development and production of products and services. By implementing standards to lower environmental risks, complying with environmental protection laws and agreements, as well as conducting appropriate reporting, BIOTRONIK ensures it can operate in a sustainable and environmentally aware manner.

BIOTRONIK Group

Code of Business Conduct - **Our** Compliance Approach - "Let's do it right!"



8.2 Social Responsibility

As part of numerous CSR projects, BIOTRONIK works with local partners in Berlin, Germany, and around the world and supports sustainable projects. We also see ourselves as promoters of the medical community. To this end, BIOTRONIK invests in sustainable training programs to ensure the best possible transfer of knowledge and to help develop junior physicians and, in particular, cardiologists. The principle that any donation or sponsorship must be in line with the applicable legal situation and our policies also applies here.

9 Our Compliance Approach - "Let's do it right!"

Compliance serves as a directional guide for how BIOTRONIK conducts its business. Knowing and complying with the relevant laws, policies, and principles should be the goal of every BIOTRONIK employee.

9.1 Overview Compliance Program

The Code forms the foundation of BIOTRONIK's compliance program. It provides guidance for action together with the more detailed and specific compliance procedures and policies. The compliance program also consists of the following basic components:

- Policies, procedures, and standards
- Compliance training
- Internal auditing and monitoring
- Immediate reactions and initiation of corrective actions regarding violations that have been identified

9.2 Guidelines

BIOTRONIK will provide you with all the information you need to perform your job in accordance with applicable legal requirements and our ethical standards.

9.3 Contact Persons

If you have any questions about compliance, please do not hesitate to contact the Corporate Compliance department or the respective regional Compliance representatives.

BIOTRONIK Group Code of Business Conduct - **Our** Ten Golden Rules



Contact Persons:	Contact:
Corporate Compliance	
Markus Paulick	markus.paulick@biotronik.com
Isabel Helbing	isabel.helbing@biotronik.com
LATAM	
Paola Soares	paola.soares@biotronik.com
MIDWEST	
Tamara Zemp-Peduzzi	tamara.zemp-peduzzi@biotronik.com
USA	
Jason Spinazzola	jason.spinazzola@biotronik.com

10 Our Ten Golden Rules

We have drawn up the following ten golden rules with regard to ethical business conduct:

- 1. We internalize the guiding principle of "excellence for life";
- 2. We are committed to upholding our values and keeping the promises we make to our customers;
- 3. We will act in accordance with this Code and will comply with any applicable laws and policies;
- 4. We a responsibility to protect the reputation of BIOTRONIK and to prevent any potential harm to the company;
- 5. We shall take appropriate preventive intervention to ensure that confidential information, business and trade secrets, and intellectual property are protected;
- 6. We support the organizational culture at BIOTRONIK, which is characterized by honesty, transparency, and integrity;
- 7. We live by the following principles: integrity, abiding by the law, mutual respect and ensuring an open and fair dialogue;

BIOTRONIK Group

Code of Business Conduct – **Actions** in Case of Violation of this Code



- 8. We support open, honest, and transparent corporate communication;
- 9. We respect the right to privacy for every individual and respects his or her dignity;
- 10. We are committed to respecting human rights and protecting the environment.

11 Actions in Case of Violation of this Code

11.1 Reporting of Violations

11.1.1 Contact Person/Confidentiality

If a BIOTRONIK representative becomes aware of a violation or possible violation of this Code, or as a minimum if they have legitimate concerns about such violation or possible violation, the BIOTRONIK representative will immediately report this to their supervisor or to the respective BIOTRONIK Compliance Officer (see section 9.3). Reports will be kept confidential to the greatest extent that is reasonably possible.

However, BIOTRONIK representatives shall not be careless when filing a report, as this might lead to false accusations. Accusations that are deliberately false will not be tolerated and will be punished accordingly.

11.1.2 Non-Retaliation

BIOTRONIK representatives who report violations or compliance concerns in good faith will not be subject to retaliation or harassment. BIOTRONIK representatives have the right to report any concerns about possible retaliation or harassment.

11.1.3 Confidential Reporting Hotline

There may be circumstances in which a BIOTRONIK representative finds it difficult reporting a concern to a supervisor or to the appropriate Compliance Officer. To facilitate reporting in those situations, BIOTRONIK will establish independent, third-party reporting hotlines in different countries, in each case subject to applicable laws and regulations.

You can access our global whistleblower system via: https://biotronik-ethics-and-whistleblower-reporting-channel.iwhistle.de/

BIOTRONIK Group

Code of Business Conduct - **Actions** in Case of Violation of this Code



11.1.4 Investigations and Corrective Actions

BIOTRONIK takes every report of possible abuses seriously and will investigate every report. If the internal review reveals evidence of potential corrective action, BIOTRONIK will then decide what steps to take to resolve the problem and to prevent its reoccurrence in the future.

11.1.5 Enforcement and Discipline

Subject to applicable laws and regulations, BIOTRONIK enforces compliance with the Code through appropriate disciplinary procedures. Disciplinary procedures are weighted according to the violation committed and the compliance history of the BIOTRONIK representative. For employees and managers, compliance-related disciplinary action may be documented in the personnel record maintained by Human Resources. In principle, disciplinary procedures arising from compliance violations should be carried out on the basis of a review of the individual case.

Any BIOTRONIK representative who violates applicable laws or regulations, or this Code may be subject to disciplinary action. All BIOTRONIK representatives should also be aware that various matters prohibited by the Code may also violate the laws and regulations of the country in which they work/reside and may result in personal prosecution, significant fines, and/or even imprisonment.

Responsible:

Corporate Legal – Compliance BIOTRONIK Corporate Services SE Sieversufer 7-9, 12359 Berlin (last updated: October 2022)