



# Supplier Code of Conduct

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## Foreword

**“Integrity is doing the right thing,  
even when no one is watching.”**

(C. S. Lewis)

At BIOTRONIK, patient welfare comes first. Preserving lives and improving patient life quality has been our motivation for more than 25 years. All of us work day after day to implement and fulfill our guiding principle **“excellence for life”**. To us, “excellence for life” means the following:

- To always give our best to achieve the highest levels of **QUALITY**. For our patients and customers. To manufacture products of the utmost reliability to ensure the **SAFETY** of patients at all times.
- To continuously work to develop innovative and unique **SOLUTIONS**.
- To provide our customers a proven, excellent **SERVICE**.

Together, these values define our culture and guide us in our daily interactions with customers, patients, business partners and employees.

Our ethical business culture is an integral part of our overall corporate identity and is implemented through various measures, such as policies and Code of Business Conduct. We believe that our continued success and reputation are the result of our continuous and consistent adherence to the highest standards of conduct. It is therefore not only our duty to deliver products and services of the highest quality, but also to ensure that honesty, integrity and respect for human rights, as well as the interests of our employees, are of paramount importance to us in our day-to-day business. We are committed to comply with all applicable legal requirements and committed to conducting our business in an ethical and honest manner. We also place this demand on our business partners.

This document summarizes BIOTRONIK's basic principles and standards for suppliers of production-related and non-production-related goods and services. These are based on globally recognized guidelines and principles on environmental and social responsibility, as well as the ten principles of the United Nations Global Compact, internationally recognized human rights and labor and social standards.

## **General Principles and Business Ethics**

### **Compliance with legal regulations**

Our suppliers live up to their social responsibility in all their business activities. In every business transaction and decision, suppliers shall observe the applicable laws and other relevant provisions of the countries in which they operate.

### **Fighting corruption**

Our suppliers do not practice or tolerate any form of corruption or other serious misconduct. In particular, the active granting of advantages and bribery as well as the passive acceptance of advantages and corruption are prohibited. Unlawful benefits include, for example, gifts of money, goods or services. This applies regardless of whether the benefits are made directly, through intermediaries, to private individuals or public officials.

### **Conflict of interest**

Our suppliers make decisions regarding their business activities with other business partners exclusively on the basis of objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons, must be excluded.

### **Fair competition**

Our suppliers respect the principles of free and fair competition. This includes compliance with all applicable antitrust regulations, competition rules, other laws and legal provisions of their country as well as all corresponding international regulations. In addition, our suppliers do not participate in antitrust agreements with competitors or the exchange of competitively sensitive information (e.g. price, conditions, quota, customer or territory agreements) in violation of antitrust law, nor do they abuse any existing dominant market position.

### **Money laundering**

Our suppliers prevent money laundering in their company by means of suitable organizational measures.

### **Data protection and confidentiality**

Our suppliers shall ensure compliance with all applicable laws for the protection of personal data (in particular of employees, suppliers and customers) as well as any other obligations arising from confidentiality agreements with BIOTRONIK.

### **Intellectual property**

Our suppliers and their employees protect BIOTRONIK's intellectual property and respect the intellectual property of others. Intellectual property includes, for example, development results, drawings, patents, trademarks and other industrial property rights, copyrights, designs, trade secrets, samples, models and other know-how. In addition, BIOTRONIK may not supply products that infringe the intellectual property rights of third parties.

### **International trade laws**

Suppliers must comply with the customs import and export laws and regulations applicable to our business relationships. It must be ensured that business premises, loading and shipping areas for manufacturing, storing, preparing and loading products within a supply chain are protected from unauthorized access. Likewise, all applicable international sanctions and export restrictions must be complied with.

### **Conflict minerals**

Our suppliers are committed to disclosing the use of conflict minerals and, upon BIOTRONIK's request, will verify that their products contain conflict minerals such as tin, tungsten, gold, tantalum or other commodities that are covered by the term "conflict mineral" as required by the U.S. Securities and Exchange Commission and the EU. We expect our suppliers to comply with the requirements of the Dodd-Frank Act (Section 1502) and the equivalent EU Regulation 2017/821, and to take appropriate measures to avoid such raw materials from conflict countries in the future.

## **Respect for Human Rights**

### **Prohibition of forced and child labor**

Our suppliers respect and support the observance of internationally recognized human rights and do not tolerate forced, child or punitive labor, slavery or human trafficking, neither internally nor at their business partners. Our suppliers shall comply with the minimum age for admission to employment in accordance with applicable national regulations. In the absence of national legislation, the internationally recognized standards of the United Nations must be complied with. If a national regulation on forced or child labor provides for stricter regulations, suppliers shall give priority to them.

### **Abuse and slavery**

Our suppliers will not tolerate inhumane treatment, corporal punishment, insults or threats, deprivation of freedom of communication and movement of employees within their organization. This includes any form of psychological pressure as well as physical, sexual or verbal abuse, intimidation or harassment.

### **Equal opportunity**

Our suppliers observe the principles of equal opportunity in the selection and promotion of their employees. Any discrimination due to employee age, physical or mental limitations, ethnic origin, external appearance, skin color, gender, pregnancy, sexual orientation, nationality, religion, marital status or other characteristics is to be avoided.

### **Protection of employee health and safety**

Our suppliers ensure compliance with applicable health and work-related laws, rules and regulations and ensure safe and healthy working conditions for their employees. In addition, they support the continuous development of occupational safety measures and systems and perform workplace risk assessments.

### **Working hours**

Our suppliers ensure compliance with national laws, regulations and industry standards regarding working hours, break times and holidays. The guarantee of working hours and break times also applies to those employees who, due to their work, do not have a fixed workplace location, such as professional drivers or installation technicians.

**Income and social benefits**

Our suppliers pay wages and social benefits that are not below the minimum legal or industry standards.

**Right to association and freedom of expression**

Our suppliers respect employee rights to freedom of association within the framework of the applicable laws and regulations. Members in employee organizations or trade union are neither to be given preference nor put at a disadvantage.

## **Environment and Animal Welfare**

### **Compliance with laws and regulations**

Our suppliers shall at all times observe all relevant and applicable legal and other provisions in the field of environmental protection and animal welfare. They are called upon to keep the negative effects as low as possible and to continuously improve environmental protection.

### **Resource management and sustainability**

Our suppliers strive to continuously optimize and reduce their consumption of energy, water and non-renewable resources.

### **Protection of animals**

In the event that suppliers conduct animal testing on the basis of laws or regulations or within the scope of their mandate, it must be ensured that such animals are treated in an ethical and humane manner. Whenever scientifically valid and accepted by regulatory authorities, alternatives to animal testing must be used.

### **Material compliance**

Our suppliers ensure compliance with all relevant, applicable legal or other provisions for substance bans and substance restrictions as well as the continuous safeguarding of associated obligations. This includes the regular proactive transmission of information to BIOTRONIK regarding material compliance. Our suppliers must provide safety information for all dangerous goods, including chemical and pharmaceutical substances, and comply with all relevant laws and requirements, including the European RoHS and REACH directives.



## **Self-Commitment and Control**

### **Processes and compliance**

Our suppliers shall ensure that their employees are informed about the contents of this Supplier Code of Conduct and their compliance with the obligations arising therefrom. BIOTRONIK respects that adherence to and implementation of the core principles and standards set forth in this Supplier Code of Conduct is an ongoing process. Therefore, our suppliers are required to continuously review and improve their standards and processes.

### **Monitoring and obligation to provide evidence**

Our suppliers will document compliance with the stated basic principles and standards by means of suitable business documents. They shall make these available to BIOTRONIK to an appropriate extent and after prior agreement upon request.

### **Supply chain**

Our suppliers are required to communicate the basic principles and standards listed in this document to their direct suppliers via similar agreements or to conclude comparable agreements with them. This is intended to achieve compliance with these basic principles and standards along the supply chain and to continuously improve the associated processes of our suppliers' subcontractors.

### **BIOTRONIK whistleblower system**

Should our suppliers detect imminent violations of applicable law or the contents of this Supplier Code by their own employees or third parties, we expect our suppliers to contact BIOTRONIK's Compliance department using our anonymous Whistleblower System: <https://biotronik-ethics-and-whistleblower-reportingchannel.iwhistle.de/>

### **Consequences of infringements**

A violation of the basic principles and standards listed here is considered a material impairment of the business relationship or the contract. BIOTRONIK reserves the right to impose appropriate sanctions in such cases.