

Supplier Code of Ethics

Duderstadt, June 5, 2020

Global Procurement



Quality for life

Scope of application

The Supplier Code of Ethics applies to all business partnerships between external suppliers and the Ottobock Group. The Ottobock Group includes all companies in which Ottobock SE & Co. KGaA directly or indirectly holds a capital share of more than 50%.

Note on equality

For better readability, the simultaneous use of masculine, feminine and diverse language forms is avoided. All references to persons apply equally to all genders.

With a tradition of more than 100 years, Ottobock as a globally operating company is aware of its corporate responsibility towards customers, employees, investors, the public and the environment. Accordingly, Ottobock requires its suppliers and business partners to act in an equally responsible manner and to comply with the underlying principles set out in this Supplier Code of Ethics, assuming corresponding regulations have not been established within the company. Only in this way can we establish long-term business partnerships which build on trust.

In this context, we request our suppliers and business partners to report any incidents in which Ottobock employees infringe the standards of this Supplier Code of Ethics or other legal requirements. Infringements can be reported via Ottobock's anonymous whistleblower system at <https://ottobock.whistleblownetwork.net/WebPages/Public/FrontPages/Default.aspx>

In compliance with the international standards that govern human rights, labour, environmental protection and anti-corruption, Ottobock's Supplier Code of Ethics is based on the universally recognised principles of the United Nations Global Compact.

www.unglobalcompact.org

In addition, the following principles of conduct apply:

I. Ethical responsibility

1. Legal compliance

In the context of delivering products to Ottobock or carrying out work for Ottobock, suppliers shall comply with all relevant laws in the respective applicable jurisdictions.

2. Avoiding conflicts of interest

Ottobock's suppliers shall base their decisions exclusively on objective criteria and shall not be influenced by personal interests and relationships. In particular, measures must be taken to avoid any kind of conflict of interest with Ottobock. Should conflicts of interest nevertheless arise in the business partnership with Ottobock, these must be disclosed.

3. The value system prohibits any kind of corruption

Ottobock prohibits all forms of corruption and illegal forms of exerting influence on public officials, business partners and employees – regardless of national borders and cultural differences. Our suppliers confirm that they comply in particular with the relevant anti-corruption laws and regulations, and that they will not directly or indirectly give financial benefits or other gifts to Ottobock employees or their family members in order to achieve or prevent a business transaction or to gain a business advantage. Ottobock employees are also prohibited from offering benefits to suppliers.

4. Fair competition is essential

Undistorted competition is not only the aim of our company, it is also in the public interest and creates a reliable framework for economic development. Competition law, antitrust laws, trade controls and regulations on sanctions form the legal basis for equal opportunities and fair competition. Every Ottobock supplier shall comply with the legal basis applicable to their respective situation. In particular, our suppliers agree not to engage in the prohibited practices of price fixing, capacity agreements, agreements with competitors to allocate customers, areas or markets, submitting fictitious offers, the renunciation of competition, or giving business partners an inappropriate advantage or disadvantage.

5. Compliance with sanctions law

Suppliers shall comply with the laws on sanctions and shall also monitor compliance in all companies in which they hold a majority shareholding. In particular, they shall ensure that the purchase or import of products within the scope of the business partnership with Ottobock does not constitute a violation of the law on sanctions and, upon justified request, shall furnish Ottobock with documents and/or information documenting compliance. For the purpose of this regulation, “sanction law” means all economic or financial sanctions imposed by the European Union, the United States, the United Nations or the country of origin of the products.

6. Prohibition of money laundering and terrorist financing

Ottobock's suppliers shall neither directly nor indirectly contribute to money laundering or terrorist financing. In this context, they must comply with all applicable legal requirements, in particular the European Union's legal framework on anti-money laundering and counter terrorist financing (Strasbourg, 20 May 2015) and the Financial Anti-Terrorism Act (Washington D.C., 17 October 2001).

7. Dealing with sensitive information and intellectual property

Suppliers shall protect all business and trade secrets of Ottobock, in particular, storing them safely such that they cannot be accessed by third parties or transmitted to third parties. Should the supplier become aware that third parties have had access to the data in question or that data has been transferred to third parties (data leak), or should the supplier have reason to suspect this, Ottobock must be informed immediately and provided with all necessary information to prevent further damage.

Our suppliers shall also respect Ottobock's intellectual property, including all patents, trademarks and copyrights, technical and scientific knowledge and the know-how developed over years. Work and business processes which are sensitive for Ottobock or business partners must be kept confidential. The direct or indirect use of non-public business information for personal benefit, for the benefit of third parties or for the disadvantage of our company is prohibited.

8. IT and information security

Every supplier is responsible for complying with data protection regulations as well as the applicable legal regulations on information security. Every aspect of information processing must be as secure as possible to ensure the confidentiality, integrity, availability and verifiability of sensitive information and to prevent unauthorised internal or external use.

II. Social responsibility

1. Protection of human rights – prohibition of forced and child labour

In the context of delivering products to Ottobock or carrying out work for Ottobock, suppliers for Ottobock shall comply with all applicable laws in the respective legal systems for the protection of human rights. This includes in particular the prohibition of forced labour and child labour, as well as compliance with the regulations on the legal minimum age for the employment of children. In this regard, the currently valid International Labour Organization Conventions No. 105 (Geneva, 25 June 1957), 138 (Geneva, 26 June 1973) and 182 (Geneva, 17 June 1999) apply.

2. Equal opportunity and non-discrimination

In order to ensure equal opportunities and create a socially responsible framework for internationality, suppliers for Ottobock shall not tolerate any form of discrimination against employees, in particular on the basis of age, gender, ethnic origin or skin colour, religion or belief, sexual identity, disability or social background.

3. Occupational safety and fair working hours

Requirements for our suppliers regarding occupational safety and fair working hours are based, where applicable, on the Occupational Health and Safety Regulations (18 June 2017). Ottobock suppliers are responsible for a safe and healthy working environment. They shall strictly adhere to all applicable regulations for health and safety at work and working hours in order to avoid injury or damage to employees or other persons.

4. Fair and reasonable wages

Ottobock's suppliers shall comply with minimum wage laws, and shall pay the respective minimum wage to their employees to whom these laws apply. Any benefits prescribed by law must be granted to employees. Wages may not be docked as a disciplinary measure. Suppliers for Ottobock must ensure that, where relevant, their employees receive clear, detailed and regular written information on their wage components.

III. Ecological responsibility

The Ottobock Group actively accepts its share of responsibility for preserving natural resources long-term. We regard ecological production as an essential part of sustainable corporate success and expect the same from our suppliers. Hence, technology which reduces consumption in production processes should be reviewed on an ongoing basis. We also expect the recycling of reusable materials, the responsible use of harmful substances and a conscious contribution to more environmental protection to be standard procedures for our suppliers. The following regulations apply in addition:

1. Legal compliance

Our suppliers must comply with all relevant legal requirements regarding the environment and sustainability.

2. Using non-renewable natural resources

Ottobock suppliers are obligated to use non-renewable natural resources responsibly and sparingly and must minimise environmental pollution in their production processes and products. They must play their part in reducing energy consumption and CO2 emissions.

3. Dealing with harmful substances

If chemicals or other materials that may pose a safety risk are released during production, adequate safety measures must be implemented at all times when handling, transporting, storing, using, recycling / reusing or disposing of such substances.

Document status

Version	Date	Author	Comments
1.0	June 5, 2020	Gao Kwintmeyer/ Catrina Achilles	

Publisher

Ottobock SE & Co. KGaA
Global Procurement
Max-Näder-Str. 15
37115 Duderstadt, Germany