

Explanatory declaration on political activities to complement the Code of Conduct

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The Ottobock Code of Conduct lays down mandatory guidelines for political activities. The following sections in the Code of Conduct are relevant to this topic:

- Section 2 Respect and trust do not exclude anyone
- Section 4 Social media
- Section 5 The value system forbids corruption in any form
- Section 6 Private interests must be separated from company interests – no conflicts of interest
- Section 7 Fair competition is indispensable
- Section 9 The economy and ecology go hand in hand

These Ottobock values also apply to politics and hence regulate our activities in this area. Within this framework, the following principles apply to our political activities:

Ottobock does not favour any political party

Ottobock does not favour any political party, group or individual.

The company's money and resources shall not be used to support any political campaign, party, candidate or organisation with a political agenda. In particular, the following actions are prohibited:

1. Using Ottobock resources to fund or otherwise support a political fundraising campaign
2. Using Ottobock premises for events organised for a political party
3. Using Ottobock facilities to publish, reproduce or disseminate political messages
4. Using Ottobock resources, including working hours, to engage in political activities (exception: an employee is entitled by law to leave of absence for political activities, and Ottobock has agreed to grant the employee paid leave for said absence) or
5. Establishing corporate political action committees to collect or donate money for political causes; this prohibition applies even if such is permitted by local laws.

However, our values allow us – within certain legal boundaries – to channel Ottobock resources into state-managed initiatives such as business forums.

Any deviations must be approved in advance by the Executive Board of Ottobock SE & Co. KGaA and must, under any circumstances, comply with all relevant laws.

We are free to voice political opinions and engage in political activities outside of our working hours. In doing so, however, we must not create the impression that we are speaking or acting on behalf of Ottobock.

Engaging with the world of politics

We are a company that lives by our values, and as such, we may from time to time involve ourselves in public political debates on topics that are of legitimate interest to our company, employees, customers, suppliers, end users or the communities in which we are based.

We are not permitted to engage in lobby work for political parties or issue statements to public officials or government authorities on behalf of Ottobock unless we receive formal instruction to do so.

The following applies to all Ottobock stakeholders and to all employees and third parties acting on our behalf:

1. Such persons must, when issuing a statement for Ottobock, declare that they are acting on behalf of Ottobock and disclose the purpose of their statement.
2. They may not issue any statement that conflicts with Ottobock values or the Ottobock Code of Conduct or with our stance on key topics.
3. They must comply with all relevant policies and other Ottobock requirements and with the applicable laws, including registration and reporting requirements.
4. Any statement they issue on behalf of Ottobock must not include misleading or inaccurate information.
5. They must not attempt to influence the political process by deploying illicit or corrupt means.
6. Their conduct must be characterised by transparency, honesty and integrity.

Involvement in organisations

We engage with trade, business and industrial organisations and groups (member organisations) that may be involved with political lobby work or other political advocacy, including issuing statements to public officials or government authorities.

We take steps to ensure that these member organisations share our values and agree with the principles detailed in our Code of Conduct and our Corruption Prevention Policy on transparent dealings with public officials and government authorities.

We conduct regular checks to ensure the stances taken by organisations of which we are members align with our values. We recognise that many of these organisations are made up of members with different political views, and that the statements they issue may therefore not always faithfully reflect the stance taken by Ottobock.

If a stance taken by an organisation of which we are a member does not align with our values, we take appropriate steps. If necessary, we withdraw our membership from the organisation in question.

We are not permitted to directly or indirectly employ public officials to engage in advocacy work or lobby work for a political party on behalf of Ottobock.

Document history

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