



Etac Code of Conduct

Contents

1. Introduction.....	3
Why a Code of Conduct?	3
What is covered by this Code of Conduct?	3
2. Our workplace.....	4
We value safety and security.....	4
We promote diversity and do not accept discrimination	4
3. Social responsibility.....	5
We protect human rights.....	5
We support the freedom of association	5
We are committed to fair employment practices.....	5
We prohibit forced labor and child labor	5
4. Business ethics.....	6
We follow laws and regulations.....	6
We compete fairly and honestly.....	6
We work to prevent corruption and corruptive practices.....	6
We avoid conflicts of interest.....	6
We comply with accounting standards and principles.....	6
5. Environmental responsibility.....	7
We care about the environment	7
We develop new products with sustainability in mind	7
We aim to minimize the environmental impact of our sourcing and manufacturing.....	7
We strive to minimize and optimize travelling and transportation.....	7
We promote recycling and reuse	7
6. Information and communication	8
We safeguard company assets	8
We protect personal data	8
We handle media requests through Senior Management.....	8
We act responsibly in social media.....	8
7. Reporting misconduct	9
We want to do what is right.....	9
Our Whistleblowing service	9
Appendix: UN Global Compact	10
Human rights.....	10
Labor.....	10
Environment.....	10
Anti-corruption.....	10

1. Introduction

Why a Code of Conduct?

This Code of Conduct has been developed for the purpose of protecting human rights and promoting fair employment conditions, safe working conditions, responsible management of our environmental impact and high ethical standards for Etac's employees, partners and stakeholders.

We are acting in a global environment where companies have an important responsibility to ensure sustainable business models and ethical business conduct. Etac supports and encourages this development. For Etac this means that we will behave ethically in all aspects of business, care for the environment, set good examples in the way we act towards each other as employees and the way we treat our customers and business partners, and follow laws and regulations wherever we do business.

I do not ask you to simply read our Code of Conduct – I ask you to commit to it and uphold it, to ensure that we always conduct business responsibly.

What is covered by this Code of Conduct?

The Code of Conduct is based on the ten principles of the UN Global Compact and is supplemented by our other Group and local policies. It does not, however, cover all aspects of behavior. There will always be areas where we need to use our good judgment as individuals.

Every Etac employee and temporary coworker, has a personal responsibility to protect and maintain Etac's good reputation as a responsible company. The Code of Conduct shall be applied throughout the entire company, including management, product development, manufacturing operations, sales, service and marketing worldwide.

Together we contribute to responsible and sustainable development in society!

Michael Wirzberger

CEO, Etac Group

2. Our workplace

We value safety and security

Employee safety and well-being is of highest importance. Etac strives to ensure a fair, safe and healthy work environment for all employees and temporary coworkers. This commitment includes to meet and preferably to exceed all applicable Health and Safety laws, regulations and standards wherever we operate.

Each of Etac Group's subsidiaries are required to develop Health and Safety plans in compliance with local national laws. All employees and temporary coworkers shall receive information about the risks in their work. Personal protective equipment shall be easily accessible and used. Training in the handling and use of protective equipment as well as all vehicles, equipment and machines shall be carried out so that all steps of the working process can be managed safely and properly.

We are all responsible for protecting each other's health and safety, both physically and mentally. Every employee is responsible for reporting unsafe or hazardous conditions to supervisors and comply with applicable workplace safety policies, laws, regulations and standards.

We promote diversity and do not accept discrimination

At Etac, we believe in the power of people and value a globally diverse and inclusive culture. Working together as a team and utilizing each individual's unique competencies and know-how is crucial to our success.

To be able to benefit from all our diverse perspectives, we are committed to create a culture of inclusion in our workplace. Therefore, all forms of discrimination are prohibited, such as discrimination based on race, sex, transgender identity and expression, sexual orientation, marital status, pregnancy, parental status, ethnicity, religious beliefs, nationality, political opinion, disability, social origin, social status, age, union membership or employee representation and any other characteristic protected by local law, as applicable. Etac employees and temporary workers are treated and are expected to treat each other with respect, fairness and dignity.

We do not accept any form of intimidating or disrespectful behavior, bullying, harassment, or unwanted sexual advances. Employees with the same qualifications, experiences and performance shall receive equal pay for equal work if they perform the same jobs under similar working conditions.

"At Etac, we believe in the power of people and value a globally diverse and inclusive culture"

3. Social responsibility

We protect human rights

Etac respects all internationally recognized human rights and the principles concerning fundamental rights set out in the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work.

We shall, in all contexts, seek ways to honor the principles of internationally recognized human rights, even when faced with conflicting requirements.

To ensure that our suppliers also fulfill our expectations with regards to human rights and working conditions, we have a Supplier Code of Conduct that is mandatory for our partners to sign.

We support the freedom of association

All employees are free to form and to join, or decide not to join, trade unions or similar representative organizations and to bargain collectively.

We are committed to fair employment practices

All employees must be provided with a written document that outlines the basic terms and conditions of employment in a language understandable to them. Salary, terms and working hours must be fair and reasonable, and, at a minimum, comply with applicable laws.

We prohibit forced labor and child labor

Child labor and modern-day slavery, including forced compulsory labor and human trafficking, are strictly prohibited in our operations, and in the operations of our suppliers. In cases where local laws and regulations do not prohibit child labor and modern-day slavery, we ensure it is prevented through our Etac Supplier Code of Conduct. Our Supplier Code of Conduct is mandatory for all our suppliers to fulfill.

”We shall, in all contexts, seek ways to honor the principles of internationally recognized human rights, even when faced with conflicting requirements”

4. Business ethics

We follow laws and regulations

As a multinational medical technology company, we are subject to a wide range of legal requirements. All Etac managers and employees are responsible for understanding and complying with all the laws, rules and regulations applicable to their areas of responsibility. We always conduct our business with integrity and honesty, and we are accountable for our actions.

Our products are classified as medical devices and are regulated by various laws, regulations and directives. For us to continue to operate as a world-leading developer of ergonomic mobility aids, it is necessary that we conduct our business strictly in accordance with all required regulation and that we always, without exception, meet the requirements applicable to our business.

Doing business in an international environment also means that it is required for us to be familiar with, and adhere to, applicable domestic and foreign laws, rules, and regulations related to export and import, anti-boycott provisions, trade embargos, and sanctions.

We compete fairly and honestly

We are firm believers in free enterprise and in fair competition on equal conditions. This system is protected and promoted by antitrust and competition law and regulation, and we always conduct our business in compliance with applicable laws and regulation.

We work to prevent corruption and corruptive practices

Etac applies zero tolerance for corruption. This means that we must not under any circumstances be engaged in, encourage or tolerate bribery through payments or other benefits to public officials or private sector employees with the aim of obtaining or retaining business or any other advantage.

Etac employees must never directly or indirectly offer or accept any inappropriate items of value, including gifts, services or entertainment. Any form of bribery, fraud, corruption or provision of inappropriate payments or other benefits are strictly forbidden and must be reported immediately to management. Openness and transparency are key elements to ensure and demonstrate compliance with these requirements.

We avoid conflicts of interest

We shall always keep personal interests apart from company business. All business decisions must be based on the best interest of Etac, rather than on personal considerations or relationships.

We comply with accounting standards and principles

All financial reporting, bookkeeping, records and financial statements for Etac must be accurate and correct and in strict compliance with all relevant accounting standards and principles.

We safeguard all business records and must also fulfil our obligation to provide accurate financial statements and other reports as stipulated to the local public, government authorities and investors.

*“We always conduct our business
with integrity and honesty”*

5. Environmental responsibility

We care about the environment

As a multinational manufacturer and distributor, we make an impact on the environment through our sourcing, manufacturing, distribution, travelling and waste management. We shall always comply with applicable environmental laws and regulations, and beyond that we shall, to the extent possible, always strive to minimize our environmental impact.

The environmental responsibility includes, but is not limited to, everything from energy and water consumption to carbon dioxide emissions, and we are all responsible for minimizing our environmental impact. Every little effort, from turning off your desk lamp when you go home to recycling your water bottle, counts in making the world more sustainable.

Etac takes the environmental responsibility very seriously and uses recognized methodologies for measuring, analyzing and reporting our environmental sustainability performance.

We develop new products with sustainability in mind

Taking responsibility for our environmental impact starts already with product development. We develop high quality, durable products that allow for a long lifetime and reuse. We strive to use environmentally friendly materials and materials suitable for recycling, limiting the amount of waste.

We aim to minimize the environmental impact of our sourcing and manufacturing

In the same way that we follow applicable environmental legislation in our own operations, we shall also place the equivalent demands on our suppliers. Environmental aspects shall thus be part of our criteria when selecting suppliers.

To minimize our environmental impact, we shall also take the greatest possible environmental consideration when selecting manufacturing methods.

We strive to minimize and optimize travelling and transportation

As a global company with customers and colleagues around the world there will always be a need to travel. However, we shall to the extent possible strive to minimize our travelling by replacing physical meetings with digital meetings. When there is a need for physical meetings we shall, with consideration of efficiency, always strive to choose the most eco-friendly option.

Transportation of our products also impacts the environment, and to the extent possible we shall minimize our impact by planning and packing efficiently to optimize the number of deliveries and distance travelled as well as by choosing the most eco-friendly transportation option.

We promote recycling and reuse

Etac recognises the importance of circular economy and our responsibility to contribute to it. We strive to recycle as much as possible at all our sites, whether it is an office, a logistic center or a manufacturing site. This includes but is not limited to recycling of residual products such as scrap metal, paper and plastic.

We also strive to make it easier for our customers to reuse and recycle our products by developing instructions for maintenance, reconditioning and recycling.

“We are all responsible for minimizing our environmental impact”

6. Information and communication

We safeguard company assets

At Etac, we protect information as a valuable asset. All employees must respect business integrity by protecting confidential and proprietary information and only disclosing publicly available information. We must be aware of the risk of unintentional exposure of information, e.g. when discussing business topics in public places or when travelling.

We protect personal data

The personal data of our employees, members of the board and business partners are treated carefully and protected in a lawful and adequate manner. In the course of our normal business operations, we collect, process and/or transfer personal data only to the extent that we have a lawful, specific, definable business need for the information and in compliance with all relevant laws and rules applicable in the markets in which Etac conducts business, including but not limited to EU General Data Protection Regulation (GDPR).

We handle media requests through Senior Management

Communicating correct external information is the Senior Management's responsibility. Our Group CEO and CFO, or other representatives appointed by them, are authorized to speak to the media on behalf of Etac Group. Our PBU managers and local Managing Directors, or other representatives appointed by them, are authorized to speak on behalf of that Etac PBU or subsidiary.

We act responsibly in social media

Etac is responsible for everything being posted on social media in the name of Etac and its subsidiaries. This means that all employees acting in the name of Etac on social media must follow our Social Media Policy.

Etac has a positive view of employees who want to be active in forums, blogs and social channels to comment, like and showcase their expertise. Etac also encourages employees to share company posts. However, it is important to note that you, as an employee, are responsible for what you publish from your private social media account and that it can reflect on Etac as a company. Hence, if sharing an update on your private account that might conflict with Etac's values, the company always recommends you to clarify that you write as an individual.

“All employees must respect business integrity by protecting confidential and proprietary information”

7. Reporting misconduct

We want to do what is right

Our company strives to maintain an open and transparent business culture, to always conduct our business in compliance with relevant rules and regulations and with high ethical and sustainability standards. The safety and well-being of all employees, customers, partners and stakeholders is of highest importance. All employees play a vital role in ensuring that we as company do what is right.

Our Whistleblowing service

Whistleblowing provides an opportunity to report suspicions of misconduct; anything that is not in line with our values and policies. Our whistleblowing service is an early warning system to reduce risks. It is an important tool to foster high ethical standards and maintaining customer and public confidence in us.

Primarily we encourage you as an employee to contact a manager in our organization with any concerns. If you feel you cannot be open with your information, we offer the option of reporting your concern anonymously.

When can I use the Whistleblowing service?

Whistleblowing can be used to inform about a concern about something that is not in line with our values or ethical standards, and that may seriously affect our organisation or an individual's well-being, health or life.

You do not need proof of your suspicions, but all information must be provided in good faith.

Your message will be securely handled

The whistleblowing service is provided by an external partner WhistleB, Whistleblowing Centre, to ensure anonymity. The communication channel is encrypted and password protected.

All messages will be processed confidentially.

Go to whistleblowing service: <https://report.whistleb.com/en/etac>

FAQ for more information: <https://whistleb.com/whistleblowing-system/FAQs/>

:

“We investigate all reports of misconduct thoroughly”

Appendix: UN Global Compact

The United Nations Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the area of human rights, labor, environment and anti-corruption.

Human rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

Labor

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labor;
- Principle 5: the effective abolition of child labor; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.