



CODE OF CONDUCT

Preamble

Our Code of Conduct is intended to be a guideline for the entire company and it therefore applies to all of us equally. Specifically, it addresses top-level management, executives, and all of our employees and our suppliers. On the one hand, it represents the demand we place on ourselves to live up to the values and principles listed therein, and at the same time it signals to the outside world what is responsible behaviour towards our business partners, customers and employees.

Commitment of the company management

RZ Medizintechnik GmbH considers itself obligated to act in an economically, socially and environmentally conscious way. RZ Medizintechnik GmbH strives to conduct its business competently and on an ethical and moral basis and to compete fairly in all markets in which it operates. This includes compliance with applicable laws and acceptance of antitrust prohibitions or restrictions on competition. The company RZ Medizintechnik GmbH wants to avoid giving improper advantages to customers, suppliers or competitors.

Quality in everything we do

RZ sells products that enable doctors to improve people's lives, cure diseases or even save lives. To this end, RZ is committed to producing and marketing safe, high-quality products and services. This commitment to quality and safety is the responsibility of all employees. Every employee is expected to ensure this in everything they do and strive for excellence. All of its activities are focused on promoting the best long-term interests for our customers and patients.

Team spirit and constructive collaboration

RZ constantly puts existing solutions in question and develops new ideas for the benefit of its customers. To this end, RZ promotes constructive teamwork among all employees. Your interests in and demands on RZ are decisive for this work and further development. RZ is successful in this collaboration due to the diversity of its employees and their commitment in the business areas.

Standards for collaboration

RZ expects all employees to always act according to the highest professional standards and the company guidelines. If employees violate existing guidelines, regulations or specifications in the course of their work or by their conduct, they are liable to disciplinary measures.

Open communication with employees

RZ does not cover up misconduct. If employees report actual or suspected misconduct in good faith, RZ will not tolerate any intimidation or reprisals against them. „In good faith“ is understood by RZ to mean that the employee is convinced that his or her representation is true. This applies, whether or not a subsequent investigation confirms the employee's version of events.

Health and safety

RZ strives to offer all employees a safe and healthy working environment. RZ tries to continuously improve working conditions – with the aim of reducing accidents and damage to health. RZ provides training to ensure that each employee understands the safety procedures applicable to his or her job. Each manager or supervisor is responsible for ensuring that this training is appropriate and that each employee has the necessary tools and capabilities to successfully perform his or her job and that all safety and health policies and procedures are followed.

Dialogue with cooperation partners

All business information of RZ partners and their trade secrets are treated sensitively and confidentially as a matter of principle. Any required documents are properly prepared, stored or, if necessary, destroyed once the collaboration has ended.

Customer orientation

RZ behaves fairly and honestly towards its customers and business partners. RZ records the wishes, needs and expectations of customers and business partners in order to ensure targeted implementation with regard to suitable products, services or other processes. The primary goal is to build a long-term and stable relationship with customers and business partners based on trust.

Acceptance of gifts, donations

a) Gifts to RZ employees

RZ employees do not demand or accept personal benefits from customers or suppliers that influence or could influence their own behaviour with regard to their

own work for the company.

If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognised as a courtesy or kindness.

The Compliance Officer or management must be informed about any gifts with a value that exceeds the customary amount.

b) Gifts by RZ employees

Gifts from RZ may also only be offered within the scope customary for the business relationship and to a materially reasonable extent. The recipient must not be able to associate with it any obligation that could influence its business decisions.

c) Donations

As a matter of principle, RZ Medizintechnik GmbH does not donate to political parties, to individuals or to organisations with goals that contradict the RZ corporate philosophy or damage RZ's reputation. Donations are always made in a transparent way.

Bribery and corruption

RZ does not tolerate any form of corruption and bribery, regardless of whether this damages its own company assets or the assets of third parties. RZ employs control mechanisms to ensure the prevention of bribery, theft, embezzlement, fraud, tax evasion or money laundering.

RZ employees are prohibited from accepting or giving favours of any kind (cash, travel, gifts, etc.) that are tied to any undue advantage (contract award, project award, etc.).

RZ business partners are also required to avoid conflicts of interest that pose a risk of corruption.

Data protection

RZ treats all personal data of customers, business partners and employees with the utmost care. This includes their names, addresses, telephone numbers, dates of birth, and current health information. RZ employees are obligated to take all appropriate measures to secure the data and to protect the IT system against both internal and external data theft. This applies in particular to any misuse of passwords within the company and unauthorised downloading of files, especially of inappropriate material from the Internet.

Protecting the environment

Protecting the environment and the climate is an important concern for RZ. RZ employees are required to treat all natural resources used by the company

(e.g., energy, expenses of water) with care. Employees are expected to have a responsible approach to the manufacture and distribution of products and/or services. To protect employees, we comply with all laws and rules concerning health and safety in the workplace. To this end, managers in particular are to take measures to create a healthy and hazard-free working environment for employees.

Compliance with applicable laws

RZ requires our managers to familiarise themselves with the laws, rules and regulations relevant to their area of responsibility and to comply with these without exception. Our managers in particular bear a high level of responsibility in fulfilling the Code of Conduct.

The business practices of business partners and their suppliers must also comply with the applicable laws. This applies in particular to import, export, and domestic trade in goods, technologies, or services, but also to payments and capital transactions.

Business partners must also rule out any violation of economic embargoes, trade, import and export control regulations, and terrorist financing.

Fair competition

RZ is committed to fair competition and complies with these laws and rules. RZ refrains from agreements on prices, conditions and strategies with competitors, suppliers, other companies and dealers that hinder fair competition. RZ does not participate in any anti-competitive boycott.

Business partners, government agencies, and customers

RZ's relationships and dealings with business partners and customers are based on fairness and openness. Although business practice varies from country to country, it is necessary nevertheless to adhere to RZ's high ethical standards and to any general business practices that apply to the particular business environment. RZ should not participate in bribery. Further, RZ shall not solicit or accept payments, rewards, gifts or favours from any customer, potential customer, government and/or government agency, or from any government agency, organisation or representative of such entity.

Prohibition of discrimination

Any form of discrimination is prohibited in principle. This is regardless of nationality, ethnicity, age and gender, sexual orientation, marital status, pregnancy or disability, or religion or belief. Promotions and new hiring will always be free of discrimination.

Dealing with internal company matters

RZ attaches great importance to the careful and responsible handling of the products manufactured, the work equipment used and the company's intellectual property.

Production of products

We ensure the safety, quality and performance of the RZ products. In developing and manufacturing these products, RZ meets the relevant legal and regulatory standards with regard to the quality requirements of the country in which RZ operates.

Protection against child or forced labour

The company strictly rejects child or forced labour without exception, wishes to distance itself from this and expects the same from its business partners. Children of compulsory school age (younger than 15 years) may not be employed even if the legal requirements of the supplier's respective country would permit this.

Human rights

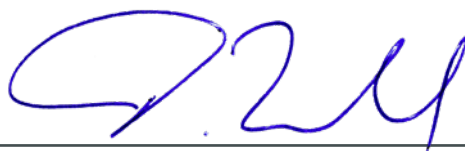
RZ supports and respects the protection of internationally applicable human rights and ensures that RZ is not directly or indirectly involved in any human rights violations.

Requirements for business partners

RZ complies with the principles set forth in this Code of Conduct and expects third parties with whom RZ works to comply with the applicable law, to adhere to ethical business practices, and to meet the requirements set forth above, particularly with respect to labour, health, safety and the environment. When selecting and dealing with business partners, RZ will also act in accordance with the principles of anti-discrimination set forth in this Code of Conduct.

Implementation and enforcement

RZ Medizintechnik GmbH is committed to making the necessary efforts to comply with the principles and values described in this Code of Conduct:



Tobias Zubrod, General Manager



Rainer Zubrod, CEO