

Third Party Code of Conduct

for the Olle Larsson Holding AG and all its subsidiaries worldwide

Version: 2.2
Effective Date: 1 January 2022
Approval Date: 7 September 2021

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Integrity Guideline for Third Parties

Being a globally operating company, the Olle Larsson Holding AG and its subsidiaries are not only subject to various laws and regulations throughout the world. We also have an ethical responsibility towards our clients, employees, business partners, suppliers, the public and the environment.

We take our responsibilities seriously and are committed to doing business in compliance with applicable laws and regulations in an ethical, transparent and sustainable way and according to our core values.

The Olle Larsson Holding AG strives to conduct business with individuals and organizations that do business in the same manner.

To support our Third Parties in meeting these expectations, our Third Party Code of Conduct provides general guidelines for our day-to-day business.

The Olle Larsson Holding AG and its subsidiaries will have separate contracts with its Third Parties. If these contracts contain more specific or different provisions, the provisions in those contracts shall prevail.

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1. **Purpose and Scope of the Third Party Code of Conduct**

This Third Party Code of Conduct ("**TP Code of Conduct**") sets up standards of business conduct and business practices with which the Olle Larsson Holding AG and its subsidiaries (together herein after referred to as "**OLH**") in all entities worldwide expect you to comply. It shall globally contribute to meeting highest ethical and legal standards in development, production, sales, product support and the provision of services.

This TP Code of Conduct applies in particular to all OLH Third Parties as defined in section 4 of this TP Code of Conduct. Our Third Parties shall provide it to all employees and other individuals or companies involved in activities for OLH in addition to any own codes, policies and other guidelines.

In addition to adherence to applicable laws and regulations, this TP Code of Conduct has to be complied with even if it demands higher standards than national laws and regulations. Contrary, if applicable laws and regulations are more restrictive, you shall always comply with those legal requirements. Please also see specifications in the contracts concluded with OLH. In case of any uncertainties, please contact us.

2. **Questions, Doubts and Concerns**

We are only able to find the best solutions and to prevent misconduct if our Third Parties interact with us. Thus, if you have any questions or doubts regarding this TP Code of Conduct, do not hesitate to contact us. We will provide you with all the support and information needed to help you make the right choices.

The same applies if you notice any potential violations of this TP Code of Conduct or any potential misconduct of any individual or company involved in our business, including your own employees. All matters raised in good faith will be handled on a non-retaliatory basis and as confidentially as possible.

3. **Violation and Consequences**

Violations of this TP Code of Conduct can have severe consequences for OLH and its Third Parties.

Therefore, OLH monitors and audits compliance with this TP Code of Conduct. This can include, but is not limited to, assessment of potential Third Parties during our selection process, on-site visits and the execution of audit and inspection rights.

We will strictly pursue any violations of this TP Code of Conduct. Consequences may include termination of business relationships and all related contracts, as well as any other appropriate measures, legal and otherwise.

4. **Definition**

A Third Party under this TP Code of Conduct is any individual or entity which does not belong to OLH, including but not limited to Business Partners and Suppliers.

5. **Fundamental Responsibilities**

5.1 **Protection of Human Rights**

We support and respect the internationally recognized human rights as stated in the UN Universal Declaration of Human Rights¹. Our Third Parties are expected to also uphold these rights and to treat their employees accordingly. We do not accept any violations of these rights and will intervene in the case of adverse events.

5.2 **Compliance with Laws and Regulations**

We require that our Third Parties comply with all applicable national and international laws and regulations applicable to their business, wherever conducted.

6. **Employment and Subcontracting**

We support and respect the internationally recognized fundamental principles and rights at work as stated in the ILO Fundamental Conventions². Our Third Parties are expected to also uphold these principles and rights and to treat their employees accordingly.

6.1 **Non-discrimination**

Third Parties shall provide a workspace free of harassment and unlawful discrimination.

We do not tolerate any discrimination because of political party affiliation, race, skin color, gender, sexual orientation, marital status, pregnancy, religion, political opinion, nationality, ethnic background, social heritage, social status, disability, age, trade union membership, and all other attributes protected by applicable laws and regulations.

¹ <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

² <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

6.2 **Conditions of Employment and Subcontracting**

Our Third Parties shall respect their employees' and subcontractors' fundamental rights at work.

We do not accept forced labor or exploitation. Our Third Parties may not use forced, bounded or indentured labor and shall pay at least the local minimum wage in their sector. Working hours of their employees and subcontractors shall not exceed limitations set in applicable laws and regulations and shall be reasonable.

Workers should be free to leave the Company upon reasonable notice, at least as provided by applicable laws and regulations. They shall not be obliged to surrender identification documents, passports or work permits as a condition of employment or subcontracting.

Minors under the minimum employment age of 15 (14 in countries with less developed educational systems) years according to Sec. 2.4 of the International Labour Organisation Convention Nr. 138³ may not be hired.

7. **Environmental Protection**

We expect from Third Parties to conduct their business in an environmentally responsible manner and in compliance with all applicable environmental laws and regulations.

8. **Quality of Products and Product Safety**

Product safety is of utmost importance to OLH. It is also vital for OLH's reputation and success. Therefore, we strive towards the highest quality and aim for constant improvements. We expect strict compliance with the corresponding duties set forth in the respective contracts in this regard.

9. **Health and Safety**

Third Parties shall commit themselves to establishing and maintaining a safe work environment. To avoid risks, safety procedures shall be carried out as required by applicable laws and regulations.

10. **Financial Integrity**

Accurate and reliable financial and business records are of particular importance to fulfill requirements for proper business conduct.

Third Parties shall correctly document all transactions with relation to their performance of the contractual relationship with OLH in their financial books and records.

³ https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138

The content of these records shall include, but not be limited to full and accurate description of performance of the Third Party and its subcontractors (e.g. contracts with service providers and time sheets), all expenditures, all payments made and any other documents created or received in connection with the contractual relationship with OLH.

Business records shall be retained in accordance with all applicable laws and regulations.

11. **Data Protection**

Personal data needs to be adequately protected. Third Parties shall adhere to applicable data protection and labor laws and regulations.

12. **Respect of Property**

12.1 **Company Assets**

Third Parties may not use our resources beyond what is contractually agreed upon, without prior written approval.

Any provided assets shall be handled with responsibility and shall be protected against loss, theft, damage or unauthorized use.

Contrary actions may not only result in termination of agreement, but also civil proceedings and criminal prosecution.

12.2 **Intellectual Property and Confidential Information**

Intellectual property is the foundation of OLH's success. Examples for intellectual property are prototypes, product concepts, marketing or sales plans and other business secrets.

Third Parties shall respect our intellectual property rights and have the responsibility to keep confidential information safe. They shall in particular not inform any unauthorized person, including family and friends.

13. **Anti-Corruption**

We are committed to combat corruption and expect the same from Third Parties.

Third Parties may not use corrupt practices – anywhere. Alleged regional customs do not lift the ban on corruption.

Third Parties shall never, directly or indirectly, offer, promise, give or demand anything of value in order to obtain business or for any improper advantage. They shall avoid any actions that might lead to the perception of improperly influencing someone's business or being improperly influenced by third-parties due to any kind of advantage granted.

Cash or its equivalents may never be offered, granted, demanded or accepted.

13.1 **Gifts and Invitations**

Gifts and invitations to meals or other comparable amenities should not be offered to individuals, group of individuals and/or entities or accepted by individuals/entities if their value, scope and timing may appear to influence OLH's and the Third Party's business, for example if the impression arises that a consideration is expected from the respective individuals/entities.

The offering and accepting of a benefit must always be within the boundaries of business appropriateness. The overall number of gifts and invitations offered to or accepted by one party always has to be reasonable.

13.2 **Donations and Sponsoring**

Third Parties may not use donations and sponsoring towards its customers to improperly influence or reward past, present or potential future use or support of OLH's products, in particular of the sponsoring recipient. Influence that results from the marketing activity itself, conducted within the sponsoring, is generally not considered to be improper.

13.3 **Dealing with Government Customers**

Third Parties shall be aware of and comply with all applicable laws and regulations, including procurement laws and regulations, that govern the acquisition of goods and services by government entities to which they directly or indirectly market or recommend OLH products and/or services.

This includes, inter alia, government officials, employees of state-owned enterprises (such as state-owned hospitals), and representatives of political parties.

Third Parties shall apply specific caution when dealing with public officials. OLH does not accept the use of facilitation payments to public officials. Facilitation payments are any advantages granted to ensure that a public official fulfills his duties quicker than usual.

The exclusion of facilitation payments applies even if such payments are not prohibited by locally applicable laws and regulations.

Cash or its equivalents may never be offered, granted, demanded or accepted.

13.4 **Discounts**

Third Parties shall follow the agreed process on standard and non-standard discounts.

14. **Lobbying**

Lobbying is any activity that attempts to influence laws and regulations. It may also comprise procurement and business development activities.

Third Parties may not conduct lobbying activities on behalf of OLH without prior explicit agreement.

Lobbyists shall act transparently and in compliance with applicable laws and regulations. Lobbyists shall in particular disclose their function as a representative for OLH and shall publicly declare OLH's interest. They shall take particular care to avoid any impression of causing a violation of duties by a public official.

15. **Conflicts of Interest**

15.1 **Objective Business Decisions**

Conflicts of interest may arise if any activity, relationship or interest may provoke doubts about one's ability to act objectively and with integrity.

Third Parties shall follow objective business criteria leaving out any private interests when making business decisions. This is essential as conflicts of interest create risks for the reputation of the Third Party and OLH.

Third Parties shall inform us in case of any potential conflicts of interest.

15.2 **Insider-Deals**

Third Parties shall treat insider information as confidential. We do not tolerate any improper use of knowledge that is not public and that was gained during performance of their duties.

Third Parties may use non-public information to which they have access due to their work for OLH or our clients only for the purpose for which it was provided. Third Parties shall not use insider knowledge for private trading and shall not share it with anyone without prior written authorization by an authorized OLH representative. They shall ensure that their employees do not take advantage of or pass such information to others.

These restrictions also apply to family and friends.

16. **Fair Competition**

Third Parties shall perform their activities in a manner consistent with all applicable competition laws and regulations considering all jurisdictions in which anti-competitive effect might arise due to our business activities.

We expect that Third Parties compete ethically and fairly for their business opportunities. Anti-competitive contacts with OLH, Third Parties, or representatives of other companies, including competitors, are strictly

forbidden. Third Parties shall in particular not make anti-competitive agreements with our competitors, such as fixing prices, output restrictions, sales conditions, rigged bids or allocations of markets.

Making misleading statements about OLH's or the Third Party's products or services, using OLH's or another company's trademarks in a way that confuses the customer as to the characteristics and source of the products or services or other deceptive measures/actions are prohibited. Third Parties shall ensure that its employees only make statements, communications and representations to customers that are accurate and truthful as they relate to OLH and its business.

17. **Anti-Money-Laundering**

Money is laundered by slipping assets originating from criminal offences into the regular economic circle.

Third Parties shall take special care when any questionable financial transactions are requested by clients, other business partners and suppliers or employees of OLH or themselves. They shall not tolerate or participate in any misuse of OLH or their company for illegal activities.

18. **Trade Controls and Sanctions**

Third Parties involved in selling or distributing OLH products and services whether domestically or internationally, shall know and comply with all import and export controls, sanctions and other trade compliance laws and regulations.