

# Code of Conduct

1. Introduction
2. Corporate responsibility
3. Conduct within the company
4. Conduct in business transactions
5. Principles of information processing

## Statement by the Supervisory and Management Board

Dear employees,

It is of particular importance for us that we contribute to improving health and quality of life all over the world as a reliable and competent partner for medicine and science.

In order to achieve these goals, it is important for us that we

- offer high-quality and innovative products and services,
- deal with each other and with partners in a respectful and fair manner, and
- meet our social responsibility as a reliable employer.

Considering ethical principles in corporate activities has a long tradition in our family-owned company and is one of the essential features of our company's development and success.

The company's integrity is shaped by the performance of its employees and their conduct in their relationships with one another and with individuals outside the company.

In accordance with our corporate values, in their conduct, all Sarstedt Group employees are obliged to:

- comply with all local, national and international laws, guidelines and customary codes of conduct and
- responsibly ensure the integrity and sustainability of their actions in relation to society, the environment and economy.

Each of us, the Supervisory and Managing Board as well as every employee is responsible for acting in line with the principles stipulated in the Code of Conduct. As a binding guideline, it provides information about how we should act in our daily business.

We ask you to ensure that the Code of Conduct is followed in your working environment and to openly address any non-compliant behaviour and improvements.

We look forward to your support!



Jürgen Sarstedt  
Supervisory board chairman



Doris Sarstedt  
Deputy of Supervisory board chairman



Hans-Günter Klein  
Director Production



Rainer Schuster  
Director Sales / R&D



Timo Schretzmair  
Director Finance

Nümbrecht, 2 January 2018

	<b>Page</b>
<b>1. Introduction</b>	
1.1 Corporate values	6
1.2 Foreword to our Code of Conduct	7
1.3 Scope, notes and contact	8
<b>2. Corporate responsibility</b>	
2.1 Responsible conduct and sustainability	9
2.2 Legal conformity	10
2.3 Principles on observing basic social rights	11
2.3.1 Observance of human rights	
2.3.2 Equal opportunities	
2.3.3 Working conditions	
2.4 Compliance with safety, health and environmental laws	14
<b>3. Conduct within the company</b>	
3.1 Acting in compliance with the Code of Conduct	16
3.2 Social behaviour	17
3.3 Role model and supervisory function of Managers	17
3.4 Service focus	18
3.5 Product safety and quality	18
3.6 Handling of company property	19
<b>4. Conduct in business transactions</b>	
4.1 Fair competition	20
4.2 Ban on corruption	21
4.2.1 Measures to avoid a risk of corruption	
4.2.2 Sanctions in the event of infringement of anti-corruption regulations	
4.3 Avoiding conflicts of interest	22
4.4 Compliance with trade, export control and customs regulations	23
<b>5. Principles of information processing</b>	

## 1.1 Corporate values

We want to retain proven traditional values. At the same time, we emphasise such values as the basic principle of our activities that will sustainably improve the company's future viability. They are to constitute a basis for successful and harmonious relationships within the corporate environment.

The following corporate values are lived by executives, the managers and the employees<sup>1</sup> at the global head office in Nümbrecht, Germany, and in the German and international subsidiaries:

### 1. We create added value

As a responsibly managed family-owned company, Sarstedt is committed to act beyond its business objective for the benefit of society. Our products increase patient and user comfort, make laboratory work more efficient and, in this way, help to improve health care.

### 2. We are a partner in medicine and science

We attach great importance to maintaining trusting and long-term relationships with our customers. Service quality, reliability and dialogue with our partners in medicine and science are our key factors to success. We therefore consistently act in a customer-oriented manner and offer a wide range of services which is exactly tailored to our customer's practical needs.

### 3. We promote innovation

The optimisation of products, techniques and services is a key factor to our sustainability. In close cooperation with users and our business partners, we therefore pursue viable research and development in order to support medicine and science with innovative products and solutions in the challenging tasks assigned to them.

As the interaction between science and economy is one of the basic prerequisites for advancements in medicine, we promote scientific associations and organisations with the aim of ensuring even better and more efficient research, diagnostics and patient care in the future.

### 4. We value cooperation

As a globally active enterprise with numerous locations and subsidiary companies, we not only cultivate collaboration with our customers, but also within the Sarstedt Group. The basis of our success is the commitment, experience and knowledge of our employees. When dealing with one another, we value fairness, respect and team spirit.

<sup>1</sup> In this Code of Conduct, the word „employee“ refers to male and female employees in equal measure.

## 5. We conserve resources

We are committed to protecting the environment and the health and safety of our employees. This is based on the use of the latest technologies and continual improvement of environmental protection and occupational safety. We focus our efforts on harmonising economics and ecology.

## 1.2 Foreword to our Code of Conduct

The Sarstedt Group's claim is that

- as a partner for medicine and science, our products and service meet the highest requirements,
- we sustainably achieve high standards in terms of our employees' conduct and in relation to our social engagement and corporate commitment throughout the entire corporate group.

To this end, we want to meet the justified expectations of trust from our surroundings and demand trusting cooperation through responsible conduct from our employees.

Our conduct is defined by

- compliance with laws, relevant regulations and international standards,
- observance of moral standards, which our employees are obliged to follow through exemplary conduct towards each other and to our stakeholders,
- the stated values of the Sarstedt Group, which define our specific requirements for the ethical business conduct of our employees.

The international Sarstedt Group stipulates as the basis for the actions of its managers and employees the business principles and Code of Conduct described below, which are dominated by values such as lawfulness, honesty, respect, reliability and fairness.

This Code of Conduct set out below defines various topics to inform our employees of the specific characteristics and conduct we expect from them. This applies to both the professional relationships with one another and with our company's business partners.

All executive bodies, managers and employees of the Sarstedt Group are therefore personally obliged to act in a lawful, responsible and moral manner in relationships with their colleagues and the people and organisations in our company's environment, and to address their justified requirements accordingly.

### 1.3 Scope, notes and contact

– Application, implementation and compliance –

In accordance with the statement by the Supervisory and Management Board of Sarstedt AG & Co. KG, our values and the following Code of Conduct apply for

**all companies of the Sarstedt Group.**

„Compliance“ means conduct aligned with the law and regulations within the organisation, in the external business environment and in relation to all of the company’s stakeholders.

**Every executive, manager and employee**

must comply with the applicable law and legislation, as well as internal regulations.

Compliance with this Code of Conduct is a mandatory minimum requirement for our managers and employees. In cooperation with the various operating departments the central Compliance Officer supports trainings and their compliance with this Code of Conduct in all Sarstedt Group companies. This is ensured via internal audits.

**Conduct that is against the rules due to negligent or intentional infringements („non-compliance“) will not be tolerated.**

Within the framework of their supervisory and inspection obligations, managers at all levels are obliged to use suitable measures to prevent employees in their area of responsibility breaching the law or the rules and to prevent the company or its environment being damaged by the conduct of its employees.

#### **Contact**

If employees notice infringements of the Code of Conduct or other legally questionable processes, this must be reported immediately.

In order to do this, employees should approach the following contacts:

- Direct supervisor
- HR department
- If employees do not wish to approach either of the contacts listed above, they can also get in touch with the Sarstedt Group Compliance Officer (email: [compliance@sarstedt.com](mailto:compliance@sarstedt.com) or telephone: +49 2293 305 2050).

Reported infringements of the Code of Conduct will be investigated together with the Compliance Department, ensuring that confidentiality is maintained. Suitable measures will be taken following consultation with the responsible managing director.

Employees who, in good faith and to the best of their knowledge and belief, report any misconduct of third parties shall not experience negative consequences as a result of making the report.

In accordance with our corporate culture, we align our actions to the benefit of society and help to improve health care and quality of life by optimising products, procedures and services. This means that our products meet the highest standards in terms of safety, precision and hygiene, comply with the highest quality requirements enhancing patient and user comfort. On the other hand, we also want to contribute to meeting our corporate, social and ecological responsibility through a sustainable, long-term orientation of our business activities. This will only happen, if we ensure compliance with applicable laws and regulations.

### 2.1 Responsible conduct and sustainability

We want our responsible and sustainable conduct in relation to society, the environment and employees in our company to contribute to improving the quality of life of our employees and the people in our company’s surroundings.

As a family-owned company, we want to support our employees and provide them with a safe workplace, deal with risks responsibly and transparently, and prevent environmental impact.

In order to do this, we align our conduct to the relevant requirements of national and international social standards for human rights, labour and environment, on corruption prevention and on the social responsibility of organisations.

Based on applicable laws and regulations as well as in additional consideration of principles and benchmarks, even if they are not legally binding, minimum standards are defined for responsible corporate activity for all Sarstedt Group employees.

This Code of Conduct also applies in countries in which the local legal situation would allow for a broader scope of action.

In accordance with our social responsibility, we also pay attention along our value chain that standards and codes of conduct are introduced which ensure compliance with these sustainability standards.

Accordingly, we carry out inspections of the relevant business partners and organisations beyond the scope of the obligatory sanction list screening (4.4). For example, sustainability criteria are also integrated into the selection process of suppliers.

### 2.2 Legal conformity

Legal conformity through compliance with the applicable laws and other legal regulations is a basic principle of our corporate culture. The applicable local, national and international laws in the relevant country and binding guidelines, regulatory provisions, as well as our internal company regulations provide the framework for our actions and must be fully complied with by all employees of the Sarstedt Group.

This also includes observance of applicable laws and regulations concerning

- basic social rights such as human rights and working standards,
- safety, health and environmental laws,
- cartel and competition law and
- anti-corruption.

Board members, managing directors, plant managers and all decision-makers with line function must ensure that legally binding standards of all kinds (laws, legal regulations, contracts, internal work instructions etc.) are complied with in their area of responsibility.

In order to do this, the relevant managers must

- inform themselves sufficiently and continuously about the key principles of the respective applicable laws and regulations,
- assess the influence on their area of responsibility, their conduct and that of their employees,
- train and adequately raise the relevant employees' awareness, and
- establish and document suitable management and control measures which are required to ensure compliance with the applicable law.

### 2.3 Principles on observing basic social rights

In line with our values and the statement by the supervisory and management board, as well as in accordance with the relevant specifications of national and international social standards, the Sarstedt Group companies take on social responsibility by supporting internationally recognised human rights and compliance therewith at all of our sites, as well as ensuring observance of the minimum requirements for working and social conditions.

#### 2.3.1 Observance of human rights

The Sarstedt Group supports and respects

- international human rights as per the UN Declaration of Human Rights and the European Convention on Human Rights,
- the principles of the United Nations Global Compact and the UN Guiding Principles on Business and Human Rights (Ruggie Framework) as well as
- the relevant guiding principles for multinational companies of the Organisation for Economic Cooperation and Development (OECD).

We expect corresponding observance of human rights both from our employees as well as from all business partners and other parties directly associated with our business activity, our products or services.

Through the continuously required due diligence in the conduct of its managers and employees, the Sarstedt Group ensures that

- it does not become complicit in human rights violations and
- there are no negative human rights effects on our own employees.

For this purpose, employees of the Sarstedt Group are required to assess the human rights risks of their actions, which could arise directly or indirectly from business relationships, and to determine the actual or potential negative effects on human rights.

An assessment would then be carried out by obtaining suitable specialist expertise and consulting potentially affected groups. The upholding of human rights must take precedence in all decisions.

Suitable complaint mechanisms ensure that potential problem areas can be detected and resolved.

### 2.3.2 Equal opportunities

Within the framework of operational possibilities, the Sarstedt Group ensures that

- the actions of our employees and managers have no negative effects on human rights,
- all employees are able to assert the rights of the Convention on Human Rights and the regulations of the International Labour Organization (ILO) in equal measure without discrimination, and in this respect
- all employees are given the right to equal opportunities in their corporate environment.

To this end we expect from our employees, in addition to acting in a lawful and professional manner, above all, the necessary diligence when dealing with their fellow human beings in a business environment.

Through the necessary respect and strong appreciation, tolerance, fairness, honesty and openness, we strive to

- prevent poor treatment, intimidation, vilification or other disparagement and prevent bullying through physical, sexual or psychological harassment, as well as any other form of discrimination, whether this is due to ethnic origin, nationality, skin colour, political views, ideology, religion, social origin and social status, marital status, gender, sexual orientation, disability, age, physical constitution or appearance, and in this way also
- ensure equal opportunities through equal treatment during employment and prevent non-permitted disadvantages in decisions on personnel.

### 2.3.3 Working conditions

As a multinational company, the Sarstedt Group

- complies with national laws and follows the key working standards of the International Labour Organization (ILO) described in the „Declaration of principles concerning multinational enterprises and social policy“,
- is guided by the regulations of „Social Accountability 8000“ on social and working standards, which are based on the ILO-Declaration, and
- aligns its conduct to the wording of the Code of Conduct of the „Business Social Compliance Initiative“ of the Foreign Trade Association (FTA) on the improvement of social standards.

In accordance with the ILO Fundamental Principles and Rights at Work and the requirements for social responsibility of the SA8000 standards, all companies of the Sarstedt Group explicitly commit to comply with the following principles themselves and will be vigilant in relation to any such infringements in their internal and external working environments so that these can then be addressed via the recognised channels:

- **Ban on child labour (ILO 138 and 182)**

Persons under the statutory minimum age for completing compulsory education, which must not be less than 15 years of age, may not be employed.

- **Ban on forced labour (ILO 29 and 105)**

Employees must not be forced into employment, either directly or indirectly, through violence or coercion. All forms of involuntary work, such as forced labour, slavery or forced prison labour, are prohibited.

- **Disciplinary measures (SA8000, 6.1)**

The organisation shall treat all personnel with decency and respect and may not take part in or tolerate physical or mental coercion or verbal abuse of employees.

- **Freedom of association and right to collective bargaining (ILO 87 and 98)**

The right of employees to freedom of association, freedom of assembly and to collective bargaining and negotiations must be respected as per the respective national law.

- **Working hours and remuneration (SA8000, 7. and 8.)**

The organisation follows the applicable laws and industrial, federal and state standards in terms of working hours, breaks and statutory public holidays. The organisation ensures that wages comply with the statutory industrial, federal and state minimum standards.

### 2.4 Compliance with safety, health and environmental laws

In line with our responsibility to society, the environment and employees and our commitment to sustainable action and legal compliance, we also comply with valid safety, health and environmental laws (SHE) as well as recognised corporate standards. In addition to the respective applicable legally binding regulations as minimum standards, we are also guided by the labour standards and guidelines for safety, health and environmental conditions in the workplace of the Fair Labour Association (FLA), see „Workplace Code of Conduct and Compliance Benchmarks“.

As described under point 2.2 Legal conformity, the managers in our organisations must guarantee that the relevant legal interests are protected in their area of responsibility.

- This means that, in the area of employee health and safety, each supervisor is responsible for protecting their employees from hazards and stresses, must identify relevant risks in the workplaces, assess them within a risk assessment, arrange suitable measures to reduce risk, and instruct, train and supervise employees.

In this respect, managers are supported by internal plant officers, such as by safety officers and occupational health and safety specialists in this area.

- Ecologically sustainable conduct is a principle which we consider throughout the value chain, from the product development, through to resource-conserving production processes, the use of the most environmentally friendly materials possible and environmentally friendly and energy saving logistics.

Each employee must contribute to achieving our environmental protection objectives by individually acting in an environmentally responsible manner, for example

- by protecting the environment through economy and reusability,
- avoiding or reducing the strain on the environment by decreasing energy and water requirements,
- avoiding or reducing emissions and waste.

In this area, the managers and employees are also supported by (plant) officers, such as the Energy Management and Waste Officer. As evidence of ecological sustainability, we have had our energy management system certified as per ISO 50001.

Our guidelines on the organisation of labour and environmental protection are integrated into our quality management system, in order to ensure that these processes are also comprehensively managed in line with statutory requirements. All necessary technical equipment is systematically provided and suitable organisational and staff-related measures are implemented (e.g. including training and further education).

All employees are obliged to

- observe the valid regulations concerning safety, health and environmental protection in their daily work,
- take appropriate measures in their business dealings and
- contact the responsible bodies if they have any concerns or suggestions for improvement.

The achievement of our standards and objectives is monitored both by the employees themselves, and by their supervisors, and we endeavour to make continuous improvements. In addition, our quality management department and the relevant plant officers conduct internal quality, environmental and work safety audits in order to continue optimising the processes. As a whole, this ensures that we meet the statutory and internal requirements for health, safety and environmental protection through suitable conduct, processes and facilities.

The conduct of a company is defined by the conduct of its employees towards one another and their conduct towards people in the company's business, social and ecological environment. We respect and encourage the individuality of each and every employee, but must also ensure a uniform high level of integrity in our business activity.

We therefore expect all employees in our professional environment to have morally and ethically impeccable mind-sets, attitudes and corresponding conduct, based on honesty, integrity and fairness, and expressed in appropriate exemplary communicative and cooperative behaviour. Positive conduct from employees results in a more harmonious cooperation, improves the quality of decisions and leads to better results overall.

### 3.1 Acting in compliance with the Code of Conduct

As already described under point 1.3 Scope with regard to application, implementation and compliance, in their daily working lives all members of the executive management, managers and employees must always examine their conduct within the organisation, towards external partners and other third parties in the company's business environment and ensure that their decisions and the resulting actions are legal and comply with the specific pertinent requirements of this Code of Conduct and the supplementary regulations.

Any internal rules on conduct and guidelines which already exist must be examined by the respective author and responsible head of division to ensure that they comply with the Code of Conduct. In the event of discrepancies, suitable changes to these guidelines must be proposed to align with this Code of Conduct.

In order to do this, employees should approach the following contacts:

- Direct supervisor
- HR department
- If employees do not wish to approach either of the offices listed above, they can also contact the Sarstedt Group Compliance Officer (email: [compliance@sarstedt.com](mailto:compliance@sarstedt.com) or telephone: +49 2293 305 2050).

The officer will discuss the proposal with the responsible executive management.

Compliance with this Code of Conduct and the guidelines stated here is a binding minimum requirement for our employees.

Conduct that is against the rules due to negligent or intentional infringements („non-compliance“) will not be tolerated.

Within the framework of their supervisory and inspection obligations, responsible managers at all levels are obliged to use suitable measures to prevent employees in their area of responsibility breaching the law or the rules in contravention of this Code of Conduct and to prevent the company or its environment being damaged by the conduct of its employees.

### 3.2 Social behaviour

In addition to adequate task-oriented conduct, we generally expect exemplary appearance and behaviour from all of our employees in the business environment which takes into account the demands of the Sarstedt Group for an exemplary moral and ethical character of the company. We therefore expect our employees to be fair, polite and respectful to one another and third parties, as well as being loyal to the company. Professionalism, fairness and reliability are the foundation for all business relationships.

For us, in addition to basic manners, such as mutual support in our commitment to achieving our shared objectives, this particularly also involves appropriate communication, cooperation and management behaviour from our employees.

### 3.3 Role model and supervisory function of Managers

Concerning the behaviour of their employees Managers do have a particular function as role models.

- Managers must act in an exemplary manner and must exemplify a rule-consistent, socially and ethically correct conduct.
- They ensure that their employees are given all information necessary on this subject, and ensure that it is understood.
- Managers are available to their employees at all times in a trusting manner as a first point of contact if they have any queries.
- They are responsible for and must work towards ensuring that the Code of Conduct is complied with by their employees. They take the necessary measures if laws or the Code of Conduct are not observed.

### 3.4 Service focus

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We understand our service focus as a key contribution to the company's success and therefore see it as a guiding principle for our employees.

The objective is to achieve a high level of customer satisfaction and loyalty, and therefore safeguard the company's economic success.

In order to achieve a high level of customer satisfaction, we want to use professional and individual service to excel in meeting our customers' specific requirements, and do this across the value chain. The most important key factors for a successful service focus are, along with an organisational structure tailored towards service throughout the company and consideration of the service mind-set when designing processes, in particular the attitudes, skills and conduct of our employees.

Our managers must ensure that their employees have the relevant and generally required social and specialist skills and guarantee that they have a service-focussed attitude, e.g. by improving motivation, promoting appropriate personal characteristics and providing training for their employees' communication skills.

### 3.5 Product safety and quality

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Our company focuses on the health and safety of our employees in the workplace as well as on the particular safety of patients and users of our products in medicine, science and other areas of application.

Our quality and safety objectives for products and product-related services are determined by the relevant applicable national and international standards and laws (e.g. Medical Device Directive), the requirements of relevant certification bodies and further specific requirements from our customers, and therefore influence our business policy, strategies and measures.

The foundation for ensuring our well-known high quality standards, and the associated particular safety of our products, is initially provided by ensuring that our employees are aware of our quality requirements for their business dealings.

This means that when making decisions on a daily basis, employees and managers in the individual departments consider possible effects on product reliability and quality. This particularly affects the development, procurement and production processes, but begins, for example, with the selection and training of staff, in the design of IT-supported processes, in the packaging and shipping and in the areas of marketing/sales/service (e.g. within the framework of information to and training of users).

In order to fulfil their necessary supervisory and inspection obligations in relation to product safety and quality, the relevant managers and safety officers use our comprehensive and incisive quality assurance and management system, which are used to organise suitable quality management processes.

Internal audits by our medical device representatives and quality officers, and external audits by authorities or national and international certification bodies, confirm compliance with statutory and official requirements and examine necessary measures on a regular basis in accordance with applicable standards to ensure that they are effective and appropriate.

Our complaint management also allows for prompt and comprehensive acceptance and rectification of any complaints and for the coordination of corrective and preventative action (CAPA).

### 3.6 Handling of company property

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Every employee is obliged to handle company property responsibly and protect it against loss, damage, theft, abuse and unauthorised use.

Accordingly, material goods such as operational equipment, machines and tools, vehicles, material, technical equipment, information and communication systems, etc., which are provided to employees by the company for the performance of their work must be properly handled by employees in line with the relevant applicable guidelines (including safety guidelines), and according to the intended purpose and carefully.

Likewise, other company assets, such as energy, consumables and supplies, must also be handled carefully and appropriately.

Intangible assets, such as confidential internal and external operational information, must be suitably protected against loss, manipulation and unauthorised access by third parties.

Losses, theft, damage and abuse of company property must be reported to the relevant supervisor and legal department immediately.

The conduct of the domestic and foreign companies of the Sarstedt Group is defined by our employees' way to act in relationships within the company and in relations with third parties. In the following description of the integrity of our conduct in business transactions, we focus on the conduct of our employees towards employees and committees of other companies and organisations.

The conduct of our employees is shaped by our visions and values, our social responsibility and our requirements for ethical conduct in the company. Accordingly, the following apply for the conduct of our employees in general and also for our conduct in business transactions:

- legal conformity through compliance with the applicable laws and other legal regulations,
- integrity through the observance of moral codes, such as honesty, respect, reliability and fairness,
- a focus on service and quality,
- ensuring the necessary transparency.

In addition, we are describing below our philosophy and regulations for ensuring fair competition, prevention of corruption and conflicts of interests, and in particular the compliance with trade, export control and customs regulations for our conduct in business transactions.

### 4.1 Fair competition

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We recognise and support fair, free and undistorted competition between companies as a guarantee of corporate freedom of action, functioning consumer protection and as a fundamental component of the market economy system.

The Sarstedt Group companies therefore do not accept any illegal influencing of the market, be this through unauthorised agreements with competitors, customers or suppliers.

Affected employees and their supervisors are obliged to comply with the respectively applicable national and international competition and anti-trust laws in their dealings with competitors, customers and suppliers.

Any form of unauthorised influencing of the market is prohibited, e.g.:

- agreements with competitors, which have the purpose or effect of excluding, restricting or distorting competition
- abuse of a market-dominating position
- other anti-competitive agreements.

### 4.2 Ban on corruption

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Corruption in its various forms infringes laws and moral standards, and is therefore not in line with the Sarstedt corporate culture. The Sarstedt Group therefore rejects any form of corrupt behaviour around the world.

As a result, none of our employees may grant or accept unauthorised private benefits (e.g. money, material assets, services) or unauthorised discounts in business transactions, which are intended to influence an objective decision.

#### 4.2.1 Measures to avoid a risk of corruption

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The German parent company stipulates the laws and moral standards in relation to corruption which are valid for all employees, and these are also a binding minimum standard for all of our subsidiaries.

In order to reduce the risk of cases of corruption,

- preventative organisational measures are adopted in all Sarstedt business units, including in relation to responsibilities, competences, reporting obligations and the selection of employees, managers and business partners,
- our employees are obligated by a mandatory guideline on corruption prevention,
- employees from the sales, marketing and procurement departments in particular are given regular targeted awareness training on this subject.

Managers must check the correctness and completeness of the regulations on which their conduct, and the conduct of the employees for whom they are responsible, is based and implement corresponding corrective measures if necessary.

In addition, all employees are obliged to familiarise themselves and comply with the laws applicable in the respective country and the internal organisational regulations and codes of conduct.

We also examine compliance with our regulations to prevent corruption via continuous random audits of business units and subsidiaries.

#### 4.2.2 Sanctions in the event of infringement of anti-corruption regulations

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Sarstedt will not tolerate infringements of applicable laws and our guidelines on corruption prevention by Sarstedt Group employees.

If Sarstedt employees are proven guilty of corruption, this will lead to sanctions against the employees.

### 4.3 Avoiding conflicts of interest

Our values demand ethical and exemplary conduct towards all group stakeholders. Professionalism, lawfulness, fairness and reliability provide the foundation for all of our business relationships. We support fair, free and undistorted competition.

Conflicts of interest due to a lack of separation between professional and private interests in decision-making situations for our responsible employees in everyday working life may call our integrity and professionalism into doubt, and must therefore be detected and prevented at an early stage. Business decisions must be made in the best interests of Sarstedt, and not on the basis of personal interests.

Therefore no member of company management and no employee must make business decisions if, upon reasonable reflection, the appearance is given that these decisions were not made on a purely objective basis, but rather that the business activity could have been influenced by personal relationships, interests or activities, even if, in the individual case, a decision influenced in this way would not have any negative financial impact on Sarstedt.

If it is not possible for the employee to avoid situations which could cause a conflict of interest in their work, the relevant employee must immediately disclose any personal interest which may exist in relation to the conduct of his work to their supervisor and record in writing so that a suitable solution can be found. If necessary, the employee may be temporarily relieved of this work assignment.

This is the case, for example, if, during their business activities, relevant members of the company management or employees have contact with existing or potential Sarstedt business partners

- with whom they or persons close to them (e.g. relatives, friends) have personal relationships,
- in which they have significant financial holdings or
- with which they intend to accept a mandate, or start a secondary job or entrepreneurial activity.

In addition, employees who have a direct or indirect influence on the commissioning of a company during their work for Sarstedt may not have private orders carried out by this company if the award of contract by the business could result in them gaining benefits for the private awarding of a contract.

### 4.4 Compliance with trade, export control and customs regulations

As a worldwide acting group of companies, compliance with the local, national and international trade law applicable in the respective country, corresponding guidelines and our internal company regulations is of particular importance to Sarstedt.

All decision-makers in Sarstedt Group companies ensure that valid regulations are complied with in their areas of responsibility.

This also includes trade, export control and customs regulations. These laws and embargoes restrict or prohibit the import, export or domestic trade of goods, technologies or services, as well as capital transactions and payments on the basis of the properties of the goods, the country of origin or use or the identity of the business partner.

When establishing structures and processes which ensure compliance with locally applicable and international regulations, our responsible employees are advised and supported by specialist employees (e.g. export control officer) in order to prevent accidental infringements of these laws and regulations and possible penalties. This means that corresponding responsibilities, procedures and inspections are documented clearly and adjusted to new requirements if necessary.

#### • Sanctions list inspection based on the „Denied Parties Lists“

In general, Sarstedt Group employees check that there is no entry in relevant national or international sanction lists before entering into a business relationship with a new business partner (persons and organisations/companies). Existing business partners are also regularly checked against updated lists.

#### • Compliance with export control rules

In fulfilment of their organisational obligation and the personnel selection and training obligation, as well as their monitoring obligation, our respective export officers integrate export controls as an effective process into the corporate processes to ensure that the valid inspection parameters of the export control rules are complied with.

The structuring and organisational monitoring of the operational export control processes may be carried out at affected sites by an appointed export control officer or customs officer. In addition, assigned employees monitor processes relevant to export control in daily business.

## 5. Principles of information processing

In order to arrange our business processes effectively, all relevant information must be provided to the required addressees.

All employees are obliged to carefully check who needs to be supplied with what information in order to make the necessary decisions quickly and on the basis of trusted information.

Confidential business information or trade secrets must be protected as a matter of principle. Before passing on information, each employee must stipulate the necessary level of confidentiality. When passing on information, sufficient security standards must be complied with accordingly.

All employees are obliged to comply with the legal data privacy provisions and to protect personal data by law. Personal data of our customers, business partners and employees may only be recorded, processed and used within the framework of the relevant applicable laws.

Our business processes are documented in a systematic, clear and reproducible manner. The statutory retention periods for documentation are observed.