

Code of Ethics

CompuGroup Medical SE & Co. KGaA and all its subsidiaries are committed to acting in a socially responsible manner and will always achieve their goals by acting ethically. As an expressed commitment to this social responsibility, this Code of Ethics sets out the specific requirements for business practice and personal conduct. The Code of Ethics applies to all employees, as well as to all business partners, and any third parties acting on our behalf.



Synchronizing Healthcare



**CompuGroup
Medical**

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Notification by the Managing Directors

Dear colleagues,

As an active player in the healthcare sector, we consider our responsibility for people's health to be part of our company's DNA. With our products highly sensitive data of many millions of people are processed. Compliance with legal regulations and standards is therefore a central component of our daily activities. In addition, we have the responsibility to respect ethical principles that may not always be set forth in applicable laws.

All CGM employees contribute to ensuring that we as a company, meet these high expectations. We would therefore like to offer compact assistance with this Code of Ethics, as well as formulate an expectation.

What is a Code of Ethics?

The Code of Ethics is a summary of guiding principles and policies that apply to all CGM employees equally. It does not matter which position you hold, which task you perform or at which location you work.

A Code of Ethics primarily describes the rules for dealing with clients, business partners, other third parties, but also of course among us colleagues.

Why do we need a Code of Ethics?

We are more than 8,600 people from 75 nations in 159 locations and 20 countries. We are very proud of this diversity. But cultural diversity also requires a common understanding of cooperation that complies both with the law as well as with our ethical principles.

Please read this Code of Ethics carefully, and on a regular basis. It is binding for all of us. If you have any questions or comments, please do not hesitate to contact our colleagues in Group Compliance and Corporate Responsibility.

Thank you very much for your commitment.

Your Managing Board

Michael Rauch, Hannes Reichl, Angela Mazza Teufer, Dr. Eckart Pech, Emanuele Mugnani





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We try to use gender-neutral wording. For reasons of better readability, we also use the generic masculine in the following, unless gender-neutral wording is used. All personal references equally apply to all genders.

Our values

Corporate values serve as a foundation and guidepost for achieving a vision. For this reason, we formulated our values in 2021.

Particularly, our values **“Act with integrity and respect!”**, and **“Collaborate and take ownership!”** underline our understanding of the legal framework and ethical principles.



Our responsibility in business activities

Fair competition

CGM is committed to the free market and fair competition. For this reason, we do not tolerate any antitrust violations in our Group and always act responsibly, fair, and in accordance with national and international competition regulations, guidelines, and laws. We expect legally compliant behavior in all antitrust matters not only from our employees at all levels, but also from our business partners and all other market participants. Acting in compliance with applicable competition law is a top priority for CGM.

We stand for a fair approach to competition

Avoidance of conflicts of interest

To ensure that our business decisions are always made in the best interests of the Group, conflicts of interest of a private, economic, or other nature, including those of relatives or other related persons, should be prevented in advance. However, should a conflict arise with private matters or other interests, our employees are required to report this immediately to the relevant manager, so that any conflicts of interest that arise can be resolved transparently and in accordance with applicable law.

Our decision is not influenced by private interests

Corruption and bribery

CGM grows with the trust of our customers, business partners, and stakeholders. To uphold this trust, CGM clearly opposes all forms of corruption and bribery and supports efforts to combat them in all forms. Therefore, any offering, promising, or granting of benefits of any kind by our employees to induce action favorable to CGM (active corruption) is strictly prohibited. Furthermore, we do not accept offers, promises, or other benefits if this could create the impression that this influences our business decisions (passive corruption).

We convince through our products and not through bribery

Insider trading and financial integrity

As a publicly traded company, it is important to us that our employees and business partners always treat insider information confidentially and that it is not misused or disclosed.

In addition, we do not tolerate money laundering or tax evasion, which we combat in every form and in full cooperation with the relevant authorities.

We treat insider information confidentially and do not tolerate tax evasion/money laundering

Donations/ sponsoring

Aware of our responsibility as part of society, CGM is involved in numerous areas of public life, such as education, science, culture, and sports. In doing so, we always donate in compliance with the legal regulations and without any expectation of receiving anything in return. CGM actively promotes transparency by disclosing all donation and sponsorship activities.

We donate transparently and do not expect anything in return

Business partners

Our business partners (e.g., customers, sales partners, and suppliers) rely on CGM as a legally compliant business partner. At the same time, we are also in dialog with our business partners and suppliers around the world and share our basic principles for ethical behavior, compliance with legal standards, and environmentally friendly actions. We expect them, as we do from ourselves, to base their actions on these same principles.

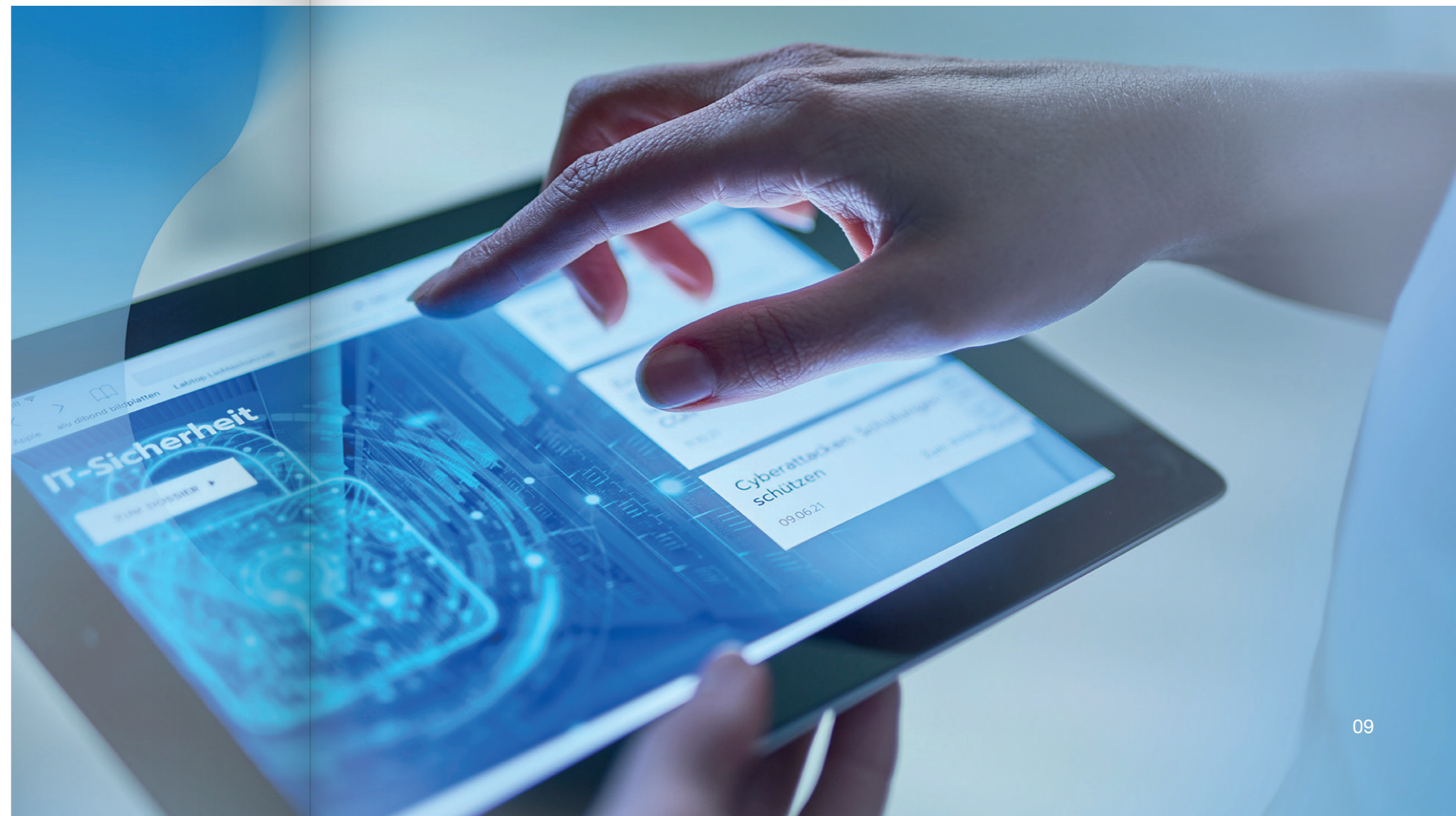
We select our business partners carefully

Our responsibility in handling data and information

Company property

The property and assets of CGM are used to achieve our company objectives. It is, therefore, the responsibility of each employee to use them properly, carefully, and only for appropriate and authorized purposes, and to protect them from theft, misuse, or loss. This applies to the protection of intellectual property of CGM, such as trade secrets, confidential information, trademark, and patent protection rights.

We treat the property and assets of the company carefully and responsibly



Data protection

Being a corporation in the IT and eHealth sector, information and data protection is of the utmost importance to CGM. By law, especially, personal data of our employees, customers, and business partners is particularly worthy of protection. Confidential processing of such data in compliance with data protection regulations is a basic prerequisite for the trust of our customers and business partners in our products and business activities. Our employees are therefore obliged to protect the data they are entrusted with in the course of their work, from unlawful processing or other misuse.

**We protect personal data
and privacy**

Information security

Information security is also a top priority for CGM. We therefore protect all company, customer, business partner, stakeholder, and employee data from unauthorized access, misuse, loss, etc. using all available and technically suitable means.

Each CGM employee is required to share all information about CGM internally and externally only with authorized persons and to protect confidential information and business documents from being viewed by unauthorized persons.

**We treat information
confidentially**



Our social responsibility

Diversity and equal opportunities

We strictly comply with applicable legal requirements for the protection of employee rights.

We are committed to diversity, inclusion, and equal opportunity, and we stand for a working environment characterized by respect and tolerance. Bullying, abuse of power, intimidation, threats, and other forms of harassment will not be tolerated.

We reject any form of discrimination. This includes any kind of unequal treatment, rejection, or preference based on gender, age, disability, sexual orientation, religious affiliation, political opinion, national or ethnic origin, and any other circumstances that may lead to a violation of the principle of equality.

Every manager is a role model with their own behavior and must ensure a working environment free of discrimination and harassment.

Decisions regarding hiring, salary, development opportunities, as well as any promotion are made solely based on skills, experience, job performance, and potential related to the position.

We live our diversity and do not discriminate



Human rights

We respect human rights, personal rights, and the dignity of our employees and all third parties. Forced labor, child labor, slavery, and human trafficking as well as any form of exploitation are prohibited at CGM. We ensure strict compliance with the relevant laws both within our organization and with our suppliers and business partners.

Within our sphere of influence, we protect human rights in accordance with the Universal Declaration of Human Rights and respect the International Labour Organization's Declaration on Fundamental Principles and Rights at Work in accordance with applicable laws and practices.

We respect the rights to freedom of association and collective bargaining in accordance with applicable laws and regulations. Our employees are free to choose to join or not join a union/employee representation of choice without threat or intimidation.

| **We stand up for human rights**

Employee health and occupational safety

The safety and health of our employees is extremely important to us. We expect our managers to ensure a healthy working environment and to pay attention to the mental and physical well-being of their employees.

Nevertheless, all CGM employees are called upon to take personal responsibility for their own health, to work together with their managers to shape their own healthy work environment, and to take advantage of the preventive and precautionary measures offered.

| **Our health is important to us**

Environment and climate

Protecting the environment and the climate forms an essential part of our corporate responsibility. We comply with all applicable environmental regulations, and we procure and use resources such as energy and water responsibly.

We actively work to minimize dependence and impact on natural resources, as well as to foster environmental sustainability.

| **We make our contribution**



Expectation of action and contact

We count on each CGM employee to implement the guidelines and values underlying this Code. First and foremost, our managers have a role model function and are the first point of contact for questions of understanding regarding this Code. They ensure that the guidelines are adhered to and take appropriate measures to prevent violations.



Information about possible violations of laws or CGM guidelines can also be passed on to us (also anonymously to the extent permitted by law) through our "Ethics Line" whistleblower system.

For further questions or concerns regarding the Code of Ethics, Group Compliance can be reached as follows:

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