CompuGroup Medical

Code of Ethics

CompuGroup Medical SE & Co. KGaA and its worldwide subsidiaries (CGM) are committed to socially responsible conduct and to always achieving their goals through ethical behavior. As an explicit 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 other third parties acting on our behalf.

For the sake of simplicity and readability, gender-specific language is not used in the following. All personal designations and terms are to be understood as gender-neutral.

Dear Colleagues,

As a player that actively shapes global healthcare, we see responsibility for people's health as part of our company's DNA. Our products process highly sensitive data belonging to millions of people. Therefore, our daily actions are significantly guided by compliance with legal regulations and standards. Beyond that, our responsibility also extends to observing ethical principles, regardless of whether they are enshrined in applicable law. All CGM employees contribute to ensuring that we as a company meet these high standards. With this Code of Ethics, we therefore aim to provide concise guidance and also to set out our expectations.

The Code of Ethics is a summary of guidelines and policies that apply equally to all CGM employees. It does not matter what position you hold, what tasks you carry out, or where you work. The Code of Ethics primarily describes the rules for dealing with customers, business partners, and other third parties — but of course also the way colleagues interact with one another.

Please read this Code of Ethics carefully — and feel free to revisit it regularly. It is binding for all of us. If you have any questions or comments, please reach out to your colleagues in Group Compliance.

Thank you for your commitment.

Your Managing Directors

Our Values

Corporate values serve as the foundation and guide for achieving a vision.

In particular, our values “Act with integrity and respect!” and “Collaborate and take ownership!” underline our understanding of how to deal with legal frameworks and ethical principles.

Our Responsibility in Business Activities

Fair Competition

CGM is committed to free markets and fair competition. For this reason, we do not tolerate any antitrust violations within our group and always act responsibly, fairly, and in compliance with national and international competition laws, directives, and regulations. 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 accordance with applicable competition law is a matter of course for CGM.

Corruption & Bribery

CGM grows on the trust of our customers, business partners, and stakeholders. To preserve this trust, CGM clearly opposes any form of corruption and bribery and supports efforts to combat it in all its forms. Therefore, any offering, promising, or granting of benefits of any kind by our employees in order to bring about action favorable to CGM (active corruption) is strictly prohibited. Unlawful payments (e.g. bribes) can have criminal and tax law consequences. Employees are therefore obligated to refrain from such acts and to report any suspected cases.

Furthermore, we do not accept offers, promises, or other benefits if doing so could create the impression that this influences our business decisions (passive corruption).

Donations & Sponsorship

Aware of our responsibility as part of society, CGM is active in many areas of public life, including education, science, culture, and sport. We always donate in compliance with legal regulations and without expecting anything in return. CGM actively promotes transparency by disclosing all donation and sponsorship activities.

Business Partners

Our business partners (e.g. customers, sales partners, and suppliers) rely on CGM as a partner that acts in compliance with the law. At the same time, we engage in dialogue with our business partners and suppliers around the world and share our core principles for ethical conduct, compliance with legal standards, and environmentally responsible behavior. We expect them, as we expect of ourselves, to base their actions on the same principles.

Avoidance of Conflicts of Interest

In order to always make our business decisions in the best interests of the group, conflicts of interest of a private, economic, or other nature — including those involving family members or other close associates — should be prevented from the outset. Should a conflict nevertheless arise with private interests or other concerns, our employees are obligated to report this immediately to their relevant manager, so that any conflicts of interest can be resolved transparently and in accordance with applicable law.

Financial Integrity

CGM participates in the fight against money laundering, tax evasion, and the financing of terrorism by not engaging in or approving such transactions. We also observe relevant trade sanctions.

Our Responsibility in Handling Data and Information

Company Property

The property and assets of CGM serve to achieve our corporate objectives. It is therefore the responsibility of each employee to use them properly, carefully, and only for appropriate and approved purposes, and to protect them from theft, misuse, or loss. This applies in particular to the protection of CGM's intellectual property, such as trade secrets, confidential information, trademarks, and patent rights.

Data Protection

As a group in the IT and e-health sector, information and data protection is of the utmost importance to CGM. The personal data of our employees, customers, and business partners in particular is deserving of special protection, including under law. The confidential and data protection-compliant processing of such data is a fundamental prerequisite for the trust of our customers and business partners in our products and business activities. Our employees are therefore obligated to protect the data entrusted to them in the course of their work from unlawful processing or other misuse.

Information Security

Information security is of great importance to CGM. We therefore protect all company data, customer, business partner, stakeholder, and employee data using all available and technically appropriate means against unauthorized access, misuse, loss, etc.

Every CGM employee is obligated to share all information about CGM internally and externally only with authorized persons and to protect confidential information and business documents from access by unauthorized individuals.

Artificial Intelligence (AI)

CGM recognizes the great potential of AI to improve healthcare delivery, reduce the workload of practice teams and make medical knowledge more accessible, in Germany and worldwide. We aim to use this technology in a targeted and practical way so that physicians and staff can spend more time with their patients. We are committed to a responsible, secure and legally compliant use of AI systems. This includes, in particular, the protection of patient and customer data, compliance with all applicable laws (including data protection and AI regulation) and adherence to our ethical principles.

Our Social Responsibility

Diversity and Equal Opportunity

We strictly adhere to the 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 are not tolerated.

We reject all forms of discrimination. This includes rejection or preferential treatment based on gender, age, disability, sexual orientation, religious affiliation, political opinion, national or ethnic origin, and any other characteristic that may lead to a violation of the principle of equal treatment.

Every manager leads by example through their own conduct and is responsible for ensuring a discrimination-free and harassment-free working environment.

Decisions regarding hiring, salary, development opportunities, and promotion are made exclusively on the basis of skills, experience, performance, and potential in relation to the role.

Human Rights

We respect the human rights, personal rights, and 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. Strict compliance with the relevant laws, both within our organization and among our suppliers and business partners, is essential to us.

Within our sphere of influence, we therefore 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 rights and regulations. Our employees are free to decide, without threat or intimidation, whether or not to join a trade union or employee representative body of their choice.

Environment and Climate

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

We actively work to minimize our dependence on and impact on natural resources and to promote ecological sustainability.

Employee Health and Safety

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

At the same time, all CGM employees are encouraged to take personal responsibility for their own health, to work together with managers to shape a healthy working environment, and to make use of the prevention and health care measures available.

Expected Conduct and Contact

For the implementation of the guidelines and values underlying this Code, we rely on each and every employee. Our managers, with their role as models, are the first point of contact for questions about this Code. They ensure that the guidelines are adhered to and take appropriate measures to prevent violations.

Reports of possible violations of CGM's laws or policies can also be submitted (including anonymously, within the scope of legal options) via our whistleblowing system "Ethics Line".

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

Group.Compliance@cgm.com

CompuGroup Medical SE & Co. KGaA

Maria Trost 21

56070 Koblenz