

Political Activities

Explanatory declaration to complement the Code of Conduct

16th January 2023

The Ottobock Code of Conduct provides mandatory guidelines to all Ottobock Group employees for political activities. The relevant articles of the Code of Conduct in this context include:

- Article 2: Respect and trust do not exclude anyone
- Article 4: Social media
- Article 5: The value system forbids corruption in any form
- Article 6: Private interests must be separated from company interests – no conflicts of interest
- Article 7: Fair competition is indispensable
- Article 9: The Economy and ecology go hand in hand

These Ottobock values also apply to political commitments and determine our activities in this area. Within this framework, the following principles apply to our political activities:

Party specific engagement

Ottobock does not favor any political party, group or individual.

The company's funds and resources shall not be used to support any political campaign, party, candidate or organization. In particular, it is prohibited to:

- 1st** Use Ottobock resources to fund or otherwise support political fundraising campaigns,
- 2nd** Use Ottobock premises for events organized by a political party,
- 3rd** Use Ottobock facilities to publish, reproduce or disseminate political messages,
- 4th** Support politicians who are directly or indirectly involved in an ongoing election campaign through communicative activities, or
- 5th** Establish corporate political action committees to raise and donate money for political causes, even if permitted by local law.

Any deviations must be approved in advance by the Ottobock management and must, in all circumstances, comply with all relevant laws.

Personal political commitment

We shall not use our working hours at Ottobock for political activities, unless we are entitled by law to leave of absence for political activities and Ottobock has agreed to remuneration for this time.

Nevertheless, we are free to voice political opinions and engage in political activities outside of our working hours. In doing so, however, we must not create the impression that we are speaking or acting on behalf of Ottobock.

Engagement in the political process

We are a company that lives by our values, and as such, we may involve ourselves in public political debates on topics of legitimate interest to our company, employees, customers, suppliers, end users or the communities in which we are based. This can include the actively addressing of political representatives.

We are only permitted to represent Ottobock's interests to public officials and government authorities if we are authorized to do so by the Ottobock management.

The following applies to all Ottobock stakeholders and to all employees and third parties, who act on our behalf:

- 1st** When making statements on behalf of Ottobock, they must declare that they are acting on behalf of Ottobock and disclose the purpose of their statement.
- 2nd** They may not issue any statement that conflicts with Ottobock's values or the Ottobock Code of Conduct or with our main stances.
- 3rd** They must comply with all relevant Ottobock requirements and with the applicable laws, including registration and reporting requirements.
- 4th** They must not give any misleading or inaccurate information in any statements made on behalf of Ottobock.
- 5th** They must not attempt to influence the political process by deploying illicit or corrupt means.
- 6th** Their conduct must be characterized by transparency, honesty and integrity.

Involvement in organizations

We engage with trade, business and industry organizations and groups that may be involved in political lobbying or other political advocacy, including issuing statements to public officials or government authorities.

We regularly review the stances and practices of this organizations for alignment with our values. In doing so, we recognize that many organizations represent members with different political views, and that the statements they missue may therefore not always faithfully reflect the stances taken by Ottobock.

If stancse or practises taken by an organization do not align with our values, we take appropriate measures. If necessary, we declare withdrawal from this organization.

Editor

Ottobock SE & Co. KGaA
Max-Näder-Str. 15
37115 Duderstadt
Germany

Contact Person

Oliver Jakobi
CEO
E-Mail: info@ottobock.com
Tel.: +49 5527 848-0

Document History

Version: 1.0
Date: 2021-10-14
Author: Dr. Berit Hamer / Mark C. Schneider
Annotation: Initial document

Version: 2.0
Date: 2022-01-16
Author: Oliver Jakobi / Karlotta Koperski
Annotation: Revised document