

# Code of Conduct

Security, Orientation and Trust

A decorative graphic in the bottom right corner consisting of two overlapping circles. The top circle is olive green and contains the text 'Quality for life'. The bottom circle is a teal color and is partially cut off by the edge of the page.

Quality for life



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**Scope of application**

This Code of Conduct applies for all employees of the Ottobock Group upon ratification by their respective company. All companies in which Ottobock SE & Co. KGaA directly or indirectly holds an equity interest of more than 50% belong to the Ottobock Group.

**Note on equal treatment**

In order to increase readability, we have refrained from the simultaneous use of both masculine, feminine and diverse pronouns. Nevertheless, all references to people apply for all genders.

## Letter from the Chairman of the Management Board

Dear Employees,

Ethical principles apply categorically and universally. Each and every freedom, including the freedom to conduct business, is based on such ethical principles as well as binding rules. Without them there would be no reliable framework for responsible economic activity.

They define the framework that establishes security, orientation and trust. In the history of our Company, which began in Berlin in 1919, there have been dramatic turning points time and again. Consensus regarding the proper course in the future was only possible in these situations, because there was an understanding as to the rules, principles and values that served us like a compass in heavy seas; consequently, we were successful and will continue to be successful in the future.

On account of this lasting effect, we have formulated overriding and generally applicable principles of conduct. They represent the authoritative guide for Ottobock SE & Co. KGaA and all of its subsidiaries. They must substantiate the general guidance so as to provide all employees with an unambiguous guiding hand in their daily conduct.

The Ottobock Group is a worldwide network and includes various cultures, traditions and market conditions. Regardless of where an employee works for Ottobock, they know that shared firm policies apply for them the same as for all other members of the Ottobock Family.

Living up to this canon of values on a daily basis constitutes a significant portion of Ottobock's history of success of which we can be proud. We continue along this path by enshrining the importance of ethics in the economy for our Company through binding principles of conduct.



Your Professor Hans Georg Näder

As a general rule, every Ottobock employee assumes responsibility for their own actions and manner of conduct. The values and principles of conduct below must always be observed to the best of your knowledge and belief. We strengthen the basis for integrity and honesty through our faithful, fair and respectful interaction with one another.

With its Code of Conduct, Ottobock orients itself on the universally recognised principles of the United Nations Global Compact in consideration of international standards for human rights, labour standards, environmental protection and anticorruption.

**[www.unglobalcompact.org](http://www.unglobalcompact.org)**

In addition, the following principles of conduct apply:

# 1. The Ottobock brand is a commitment to quality

Ottobock stands worldwide for high quality and technologically outstanding products and services. With this commitment to quality we are well aware of accepting a high level of responsibility from research and development to production and testing to distribution and customer service.

In accordance with the founder of our Company Otto Bock's dictum that the most important standard of quality is the positive effect for the users of our products, the needs of our customers remain to this day the focus of our quality management.

In order to keep up with the accelerated pace of technological progress, we continually invest in the training and further education of all of our technical personnel. The principle of honouring the commitment to quality at all times defines the conduct of our employees.

# 2. Respect and trust do not exclude anyone

As an internationally positioned employer, we attach great importance to multicultural interaction underpinned by respect and trust. We experience diversity in the teams as an advantage and bring people with different individual experiences, convictions and viewpoints together.

In order to ensure equal opportunity and to shape our international character along socially equitable lines, we do not condone any discrimination of employees, in particular based on their age, gender, their ethnic origin or skin colour, religion or world view, sexual identity, handicap or social background.

That means that Ottobock does not tolerate any discrimination in the workplace or when hiring.

### 3. The protection of property

Our employees are mindful of the Company's material value; they use its property solely for work-related purposes, handling it properly and with due care.

All employees have the responsibility to ensure as best as possible that Ottobock's property is not misused, wasted, damaged, lost or stolen.

Company property may not be sold or loaned out or used for non-company purposes without express permission, regardless of its condition or value.

### 4. Social media

Social media is an important part of present-day business and its significance is growing. Social media means communication media and interaction between people in cyber communities and social networks; for example, Twitter, Facebook, LinkedIn, blogs, wikis, video-streaming websites (e.g. YouTube) and much more.

Social media may be used upon express approval for business needs. Only patient or customer information may be communicated, provided that this is part of one's job description.

All employees shall at all times express themselves in social media with sincerity and respect for Ottobock, other employees, business partners, customers and competitors. Insofar as employees communicate their personal opinion online, they shall do so in their own name and not in the name of Ottobock or while using an Ottobock email address. Otherwise, the same rules of the Code of Conduct also apply in social media, for example with respect to discrimination.



## 5. The value system forbids all types of corruption

Our Company owes its excellent position on the international market to innovative products, expertise in problem solving and first-rate product-related services. Our competitive advantage based on technology and quality not only renders recourse to corruption unnecessary, corrupt practices also contradict the self-imposed standard of fair and purely performance-based competition.

The position of our Company can only be maintained and defended against the competition if we are prepared to develop innovations continuously and to transform them into marketable products. Therefore, corruption is counterproductive and hinders a realistic assessment of the ability of our products and services to compete.

Detailed rules regarding the avoidance and combating of corruption are set forth in the guideline **Anti-corruption & Conduct in Business Dealings**. Internal control systems document the business processes and ensure the transparency of decision-making.

## 6. Private interests are to be kept separate from the interests of the Company – no conflicts of interest

All employees must always separate their private interests and those of the Company.

All situations – or even just their appearance – in which an employee could come into conflict with their private interests while carrying out their work assignments are to be avoided.

If there are business contacts that harbour the risk of such conflicts of interests, this must be fully disclosed.

Significant participation in a competitor, customers or suppliers, even on the part of close family members, are to be reported in writing to your supervisor.

## 7. Fair competition is indispensable

Genuine competition is not only one of our Company's objectives, it also lies in the interest of the general public and creates a reliable environment for economic development. Competition and anti-trust law forms the legal basis for equality of opportunity and fair competition, to which every employee is committed to uphold. This means, in particular, a commitment to uphold the prohibition of price and capacity agreements, arrangements with competitors concerning the allocation of customers, regions or markets, submissions of sham offers and non-competition agreements as well as improper preferential treatment of or discrimination against business partners.

## 8. Sensitive information is to be handled with discretion

The safeguarding of confidential, secret and personal data counts as one of the basic principles in all relationships with colleagues (including former) as well as their family members, job candidates, customers, suppliers and other groups of people.

Personal data may only be collected, processed or used if necessary for clearly defined and legitimate purposes. Our Company ensures that the use of data is transparent for those affected and that their right to be informed and to correct errors is respected.

Every employee is obligated to comply with data protection provisions as well as statutory provisions and Company regulations regarding

information security and to safeguard the data entrusted to our Company from improper use. Our Company undertakes to adhere to an appropriate standard for the safeguarding of information processing. All components of information processing must be so secure as to ensure the confidentiality, integrity, availability and verifiability of information worth protecting and to prevent unauthorised internal or external use.

Business or trade secrets are strictly confidential. This principle must also be observed for the protection of information from our business partners. Confidentiality must be maintained regarding working and business processes in the Company that are sensitive for our Company or for business partners. The direct or indirect use of nonpublic business information for personal advantage, for the advantage of third parties or to the detriment of our Company is prohibited.

Intellectual property is indispensable for the success and economic development of Ottobock. Thus, our intellectual property must be safeguarded, including all patents, brands and copyrights, business secrets, technical and scientific knowledge and the expertise of our Company developed over the years. Ottobock reciprocates by also respecting the intellectual property of others.

The obligation to comply with all aforementioned points applies even beyond the duration of active employment.

## 9. Economics and ecology go hand in hand

Our Company actively lives up to its shared responsibility for the sustainable protection of natural resources. Energy management assesses the integration of further consumption-reducing technologies in the Company's production processes on an ongoing basis. The recycling of reusable materials and the responsible handling of pollutants are also an elementary component of our conduct and an intentional contribution towards increasing environmental protection. Ecologically sound production is for us an important part of the long-term success of our Company.

## 10. The health of our employees must be promoted

Our Company lives up to its responsibility to prevent illnesses and to facilitate the return to the workplace after absences as an expression of our appreciation and fairness to our employees. In addition, preventative measures for the benefit of the employees are promoted.

Ottobock aims to offer reliable, healthy and productive solutions for the safety of our employees in the workplace. Consequently, all requirements for the organisation of health, occupational safety and working time are to be strictly upheld in order to avoid injury or harm to employees or to other people.

Since a positive working environment can also contribute substantially to the prevention of work-related illnesses, executives are encouraged to cultivate a constructive atmosphere and to prevent mobbing.

In particular, the consumption of alcohol and illegal drugs jeopardises the health and safety of our employees. Working under the influence of these substances is strictly forbidden.

# 11. Social engagement distinguishes our Company

Our Company appears publicly as a sponsor and patron and thereby embodies the principle of bearing its social responsibility above and beyond its role as an economic factor. The projects to be supported can range from initiatives for the benefit of the attractiveness of a location to international collaborations.

“Encourage others to correct errors, be proactive and make decisions.”

Otto Bock, 1944

“Nearly 100 years on, our values – such as honesty, trust and reliability – are still intact. As the head of the family in its third generation, and as the owner and chairman of the Management Board, I’m proud that our culture of mutual respect is alive and well.”

Professor Hans Georg Näder

“In the long run, taking the straight and narrow road in management is the most rewarding approach, and one which is more highly valued in the business world than you might think. – Robert Bosch (1921)”

Dr. Bernd Bohr, Vorsitzender des Aufsichtsrats

“The trust placed in us by the people who use our products, our patients, customers and business partners, plays a significant role in the success of Ottobock. The Näder family has exemplified this over the past 100 years. Let’s all work together to ensure that Ottobock continues to be known not only for its excellent and innovative products and services in future, but is also valued as a reliable, trustworthy and fair partner.”

Philipp Schulte-Noelle, CEO/CFO

“Thanks to our innovative products, our expertise in the field of Patient Care and our international presence, we have earned ourselves an outstanding position on the global market. Like good sportspeople, we regard competition as a challenge which we continuously respond to with innovations and market-ready products, and we engage fairly with our competitors on equal footing.”

Ralf Stuch, CSMO

“Across the world, regulatory requirements are becoming stricter for medical devices in general and for reimbursement systems in particular. This can be seen for, example, in approval requirements for products as well as in specifications for clinical studies. Ottobock is able to meet these increased requirements, and Compliance therefore represents a genuine competitive advantage for Ottobock. We ensure our leading edge on the market is fair and benefits our users.”

Dr. Andreas Goppelt, CTO

“Like many other companies, Ottobock has in the past experienced the extent to which single, corrupt employees can damage the company. We do not want to give such persons any opportunity to endanger the hard work put in by our teams, and we will create appropriate structures to safeguard our success over the long term.”

Arne Jörn, COO

“The Executive Board and the Works Council collaborated closely to develop this Code of Conduct, and we assume joint responsibility for supporting it.”

Betriebsrat, Duderstadt

“We in the legal department took over the area of compliance five months ago. And we took this step with great respect, fully aware of the significance and scope of this area of responsibility. So we’ve been truly delighted to see just how committed and open our colleagues in the various departments have been, and how much trust, time and expertise they have invested on behalf of Mr Pfaff and myself. In our current project, ‘Inventory of Existing Compliance Systems’, you can clearly sense the mutual desire to make Compliance better and more professional. And this also corresponds to our approach: We can only succeed by working together, with openness and trust. I’d like to thank all of our colleagues for this good start, and I look forward to continuing on this journey together!”

Regina Thums, Head of Legal & Compliance

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