

# Code of Conduct



# Foreword

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## *CIM med Vision*

What we care about most is the human wellbeing. With everything we do, we put the patient at the centre. We are led by our moral compass. Responsible behaviour and mindful actions are more than buzzwords, we live up to these values which define us as a company. We manufacture mounting solutions to help patients, clinical staff, and our partners. With our expertise, we challenge and improve our products every day, thus rising the standards of clinical excellence.

Our vision and values guide the choices and decisions we make every day. Our vision is our compass affirming the direction we are all headed together. Our values outline how we show up and interact with one another, our customers, our suppliers, and the communities where we work, live, and play. Our vision and values are clear and simple. Together, they set the tone for our culture and ethical behaviour as well as form the solid foundation upon which our Code of Conduct is built.

You as our employee, business partner, or supplier play an important part in the success of our company. We ask each of you to live the values and adhere to this Code of Conduct and hold yourself and each other accountable to a high ethical standard. By doing the right thing in every situation, every day, we will achieve our vision.

We count on your commitment.

*Manuela Deverill, CEO*



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## Promise

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We are committed to environmentally and socially responsible business behaviour. We pledge ourselves to fulfil all international standards of ethical business management, adhere to national and international laws, and integrate the Code of Conduct into our daily activities, processes, and company culture. We oblige ourselves to ensure that integrity and ethics are maintained in all business relationships. We encourage ethical decision-making and discussions. Furthermore, we strive continually to optimise the sustainability of our activities and products and we ask you to contribute to these efforts in the spirit of an integrated approach.

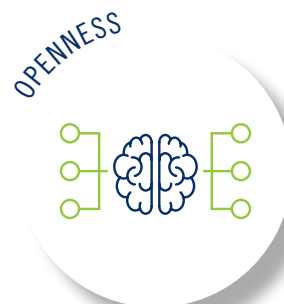
The Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations' Universal Declaration of Human Rights, Guiding Principles about Children's Rights and Child Labour, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation's International Labour Standards, and the Global Compact of the United Nations.





## Purpose of this Code of Conduct

The Code of Conduct sets out a clear vision that we must strive to realise in order to secure long-term business success. We can only achieve this goal together and our values such as **personal responsibility**, **openness**, **transparency** as well as **legal and ethical compliance** play a vital role in this.



The Code of Conduct provides an orientation framework and applies equally to every one of you. **Our employees, our business partners, and our suppliers.** It sets a standard for ourselves and at the same time represents a promise that we will act responsibly both externally in our dealings with business partners and the general public as well as internally in our interactions with colleagues.



# Fairness and Respect - Our Responsibility towards Humanity

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## Human Rights

*We treat everyone with dignity and respect.*

We respect and protect internationally recognised human rights and treat all employees, business partners, and suppliers with dignity and respect. This applies as much to our own company as it does to our contractual partners and supply chains.

## Forced Labour, Human Trafficking and Child Labour

*We say no to any form of mistreatment of labour.*

In every stage of our supply and production chain, we stand against forced labour, human trafficking, and child labor. All work must be done by choice, and employees must be able to end the work or the employment relationship at any time. We condemn trafficking persons or using any form of slave, forced, bonded, indentured, or prison labor. This includes recruiting, transporting, harbouring, or receiving a person by the use of force, coercion, deception, fraud, abduction, abuse of power or vulnerability, or by the provision of payments or other benefits. We condemn child labor. Business partners are called upon to adhere to the ILO conventions' recommended minimum age for the employment of children. According to these recommendations, the age should not be lower than the age at which compulsory school attendance ends, and should in no case be lower than 15.

## Prohibition of Discrimination

*We have zero tolerance for intolerance.*

We see diversity as an opportunity and an invaluable asset to our company. A diverse workforce helps us to produce better results. That is why we strive towards achieving diversity and equal opportunities in all aspects of our business. This applies, for example, to discrimination based on gender, race, skin colour, disability, political convictions, family background, religion, age, pregnancy, or sexual orientation. The personal dignity, privacy, and personal rights of every individual shall be respected. We value our differences, learn from each other, and grow stronger together.



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## Harassment-Free Environment

*We stand up against offensive behaviour.*

Every individual has the right to work in an environment free from harassment, regardless of whether the harasser is a co-worker, manager, customer, vendor, or visitor. Harassment includes any behaviour (verbal, visual, or physical) that creates an intimidating, offensive, abusive, or hostile work environment.

## Fair Wages and Fair Working Hours

*We appreciate our employees.*

We pay our employees fairly and offer fair working hours. All our workers - regardless of his/ her education - are paid sufficient wages to cover the usual costs of living while allowing the worker to accumulate the minimum amount of savings. We do not consider the statutory minimum wage unless the worker can cover the living costs with one regular occupation.

The working hours comply with the applicable laws and industry standards. Overtime is only permitted if it is performed on a voluntary basis and does not exceed a total of 12 overtime hours per week. The total weekly working hours cannot regularly exceed 48 hours. Benefits for overtime are offered as compensation for our employees' commitment.

## Freedom of Association and Speech

*We seek dialogue.*

We recognise and respect the freedom of our employees to associate with any employee organisation of their own choosing under national law without fear of reprisal, intimidation, or harassment.

We value our employees', business partners', and suppliers' opinions and trust in our company. That is why we communicate honestly and openly. We engage in dialogue with our employees, business partners, and suppliers to achieve the best results for our company and our partners.





# Health and Safety - Our Responsibility as Employer

## A Healthy and Safe Environment

*The health and safety of our employees is dear to our heart.*

We are committed to the health and safety of our employees above and beyond the measures enshrined in law, offering preventative measures to foster a healthy lifestyle. We strive to establish an awareness of this mindset in every one of our employees. We count on every employee to maintain a safe, healthy, and environmentally friendly workplace.



## Occupational Health and Safety Management

*We believe that any incident at work is preventable by knowing the risks.*

We maintain processes to identify and document foreseeable occupational health and safety hazards in the work environment and make all efforts to manage the risks associated with those hazards. Foreseeable hazards are physical, chemical, biological, ergonomic, and mechanical, and examples may include noise, illumination, indoor air quality, and emergency preparedness.



## Health and Safety Communication

*We promote a culture that encourages a shared responsibility for workplace safety.*

We encourage all employees to identify and report situations that may pose a potential risk and take care of colleagues and team members. All employees undergo appropriate workplace health and safety training in their primary language and have access to regular update training on applicable health protection and safety norms and measures. Health and safety-related information is clearly posted in the facilities and available to everyone.

## Drugs and Alcohol

*We follow a zero drug and alcohol policy.*

We require our employees to work free from the influence of any substance, including drugs and alcohol, which may prevent an employee from conducting work activities safely and effectively. We expect to live our values by showing up each day ready to focus on creating innovative, quality solutions for our customers.

# Protecting the Environment - Our Responsibility for Future Generations

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## Avoiding Negative Impact on the Environment

*We care about the environment.*

We endeavour to have an as little negative impact on the environment as possible when it comes to the life cycles of our products and services. We recycle, sort waste, and contribute to reuse. We strive to reduce the climate impact of our vehicles and limit the number of business trips. We compensate for flights by donating to MyClimate. We follow laws and regulations and set clear goals for how we can reduce our environmental impact as we improve our working methods. As we strive for a sustainable environment, we also place demands on our business partners and suppliers.

## No Waste of Natural Resources

*It is our shared responsibility to reduce the consumption of water, energy, and paper.*

We have created a culture of awareness to use water and electricity sensibly and to reduce the burden on nature. We have gone paperless in our day-to-day business exchanging printed literature to digital documents.

## Eco-Friendly Design

*We keep nature in mind when developing our products.*

We embrace the challenge of balancing product quality, performance, and manufacturing when adding extra requirements to material choices and incorporating the need for an intact environment when developing our products. We use sustainable materials throughout our product range with a longer lifespan, reduced need for replacement, and minimising waste. Our products can be upgraded or recycled at the end of their life cycle. We use environmentally friendly packaging and the most economical shipping methods.

## Sourcing Locally

*Our supply chain starts right at our doorstep.*

We source our materials in Germany and Europe to reduce our carbon footprint. We expect our suppliers to comply with all legislation and directives on the protection of the environment and energy sources.

## Dealing with Conflict Minerals

*We are not involved in conflict minerals that are mined to finance armed conflict and abuse human rights.*

For the conflict minerals tin, tungsten, tantalum, and gold, as well as for additional raw materials such as cobalt, we expect our business partners to establish processes in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Smelting and refining without appropriate and audited processes of due diligence must be avoided. All our business partners must provide proof of compliance.

# Following National and International Laws

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## Privacy and Data Security

*We responsibly use personal information and data entrusted to us.*

Confidentiality, integrity, and trustworthiness are at the forefront of our activities and are the key to our success as a business. We process all personal data in accordance with applicable laws and implement appropriate protection for data and information in line with its criticality. We keep official and regulatory data confidential and implement special measures to protect it from sabotage.

## Proprietary and Confidential of Information

*We safeguard our intellectual property and those of our business partners.*

We protect confidential information obtained during the cooperation with our business partners, customers, and suppliers and we share this information only with employees who have a legitimate need for access.

## Corruption and Personal Gains

*We apply the highest standards of integrity to all business activities.*

We pursue a zero-tolerance policy for bribery, corruption, extortion, and embezzlement. We act transparently and make sure corruption is eliminated as soon as the first signs emerge. We apply processes for monitoring and implementing norms in order to ensure compliance with anti-corruption laws. A bribe is defined as offering or receiving anything of value to any person for the purpose of obtaining or retaining business, or securing an improper advantage, e.g. cash, cash equivalents, gifts, entertainment, internships, employment, or a promise.

## Money Laundering

*We prevent money laundering.*

We make sure that we prevent any payments being received or made for the purpose of laundering money from criminal sources. We identify suspicious transactions and assess their legality. If necessary, we stop such payments from being made and report them to the authorities.

## Import, Export and Anti-Boycott Laws

*We are committed to full compliance with all laws and regulations applicable to conducting our business.*

Among these laws are those that regulate exports of products and technology and regulate business with countries, entities, and individuals that are subject to embargoes or sanctions. We keep a close eye on global developments and the political responses to them. We meet all legal requirements when it comes to international trade and our obligations regarding goods and taxes. We pay all necessary import duties and comply fully with bans and restrictions on imports and exports.





# Business Ethics

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## Responsible Sourcing and Due Diligence

*We are diligent.*

We exercise due diligence in all our business operations, including the development of due diligence policies and management systems to identify applicable risks and take appropriate steps to mitigate such risks.

We follow a process to select our suppliers based on objective decisions. Criteria such as quality, reliability, financial stability, sustainability and price are what matter to us. We only choose suppliers who are committed to following our guidelines concerning quality, share our principles, and hold themselves up to the same standards as us. We make sure that agreements are clearly defined and concluded in writing.

## Quality

*We do not compromise on our products.*

It goes without saying that our mounting solutions are ergonomic, safe, and sound. Where this requires testing, we exercise due care, with the aim to protect the safety and well-being of those involved, in compliance with the relevant regulations and our own high standards.

What we are proud of is the holistic approach of our daily work: Our guiding principles are longevity, sustainability, and infection prevention, however, with everything we do, we put human well-being at the centre.

Our products comply with all legal and regulatory requirements and meet the highest standards of quality throughout the entire product lifecycle. Our employees make sure that the focus is on customer satisfaction across the board, from development to production and supply, all the way through to sales and service.

## Fair Competition

*Fairness and honesty form the basis of our business activities.*

We believe in ourselves. Our company's success is based on innovation, quality, and performance at fair and competitive prices. We adhere to all relevant antitrust laws, which particularly prohibit agreements and other activities to influence prices or conditions. We do not strive for agreements that limit our customers' choice of product.

## Intellectual Property

*We safeguard our intellectual property and those of our business partners.*

Intellectual property is one of the most valuable assets. Intellectual property includes patents, trademarks, copyrights, trade secrets, and know-how. We respect and protect the intellectual property of our company, business partners, customers, and suppliers.

## Social Media

*We are professional.*

We use social media for internal and external communications in a responsible manner. We respect our audience and the right of our business partners' privacy. We remain professional in our conduct. We are mindful of our reputation and those of our business partners, customers, and suppliers. We encourage our employees to practice kindness, respect, and positivity. We do not tolerate any form of online harassment, whether from or against employees, business partners, or suppliers.

# Ensure Compliance with this Code of Conduct

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## Voicing your Concern

### *We speak up.*

We each have a responsibility to promptly raise concerns of known or suspected violations of the Code of Conduct, laws, regulations, or company policies. This level of accountability and effective communication is expected from our employees, business partners, customers, and suppliers. It protects our company from illegal or unethical misconduct, preserves our reputation as a trustworthy partner, and strengthens our position in the market.

## Compliance Investigation

### *We act.*

Once a concern is reported, we investigate it promptly and thoroughly in accordance with local laws. Each report is reviewed and a determination is made whether to further investigate or, what, if any, action is appropriate. All investigations are conducted with integrity, discretion, and impartiality, ensuring fairness and confidentiality. Our employees, business partners, customers, and suppliers are expected to cooperate fully and candidly in any investigation.

## Your commitment

### *We count on our employees, business partners, customers, and suppliers.*

It's up to each of us to uphold the highest standards of integrity and set the example for expected workplace and business behaviours. We expect all our employees, business partners, and suppliers to follow both the spirit and the letter of the Code in all company matters.





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