

Supplier Code of Ethics

Scope of application

The Supplier Code of Ethics applies to all business relationships between external business partners and Näder Holding.

Equality notice

For better readability, the simultaneous use of masculine, feminine and diverse forms of language has been dispensed with. All references to persons nevertheless apply to all genders.

Foreword

With more than 100 years of tradition, the Näder family, as a globally active entrepreneurial family, is aware of its corporate responsibility towards customers, employees, investors, business partners, the public and the environment. We at Näder Holding work for and with people. They are the focus of our business activities. Our goal is to improve the lives of our users with innovative technologies and supplies. Our Supplier Code of Ethics formulates our standards for our business partners. Adherence to this declaration of principles sets the course for a successful and long-term cooperation with Näder Holding.

I. Ethical responsibility

1. compliance with legal requirements

The business partners of Näder Holding confirm that they comply with all relevant laws of the respective applicable legal systems in connection with the delivery of products to Näder Holding or the performance of work for Näder Holding.

2. Avoidance of conflicts of interest

The business partners of Näder Holding shall make their decisions exclusively based on objective criteria and shall not be influenced by personal interests and relationships. In particular, measures shall be taken to avoid any kind of conflict of interest vis-à-vis Näder Holding. Should conflicts of interest nevertheless arise in the business relationship with Näder Holding, they must be disclosed.

3. The value system prohibits any kind of corruption

Näder Holding prohibits any kind of corruption and any unlawful form of influence on public officials, business partners and employees - regardless of national borders and cultural differences. Our business partners confirm that they comply with the relevant anti-corruption laws and regulations and do not directly or indirectly make financial contributions or other gifts to employees of Näder Holding, Ottobock or their family members in order to achieve or prevent a business transaction or to gain a business advantage. Likewise, employees of Näder Holding are prohibited from granting benefits to business partners.

4. Fair competition is indispensable

Undistorted competition is not only a goal of our company but is also in the interest of the general public and creates reliable framework conditions for economic development. The rules of competition and antitrust law as well as trade control and sanctions regulations are the legal basis for equal opportunities and fair competition. Every business partner of Näder Holding undertakes to comply with the legal basis applicable to him. Our business partners undertake to comply with the prohibition of price and capacity agreements, agreements to share customers, territories or markets with competitors, submission of sham offers, waivers of competition, as well as the improper preferential treatment or disadvantage of business partners.

5. Compliance with sanctions law

The business partners undertake to comply with the sanctions law and ensure this also for the companies in which they hold a majority interest - in particular, they guarantee that the purchase or import of products in the context of the business relationship with Näder Holding does not constitute a violation of the sanctions law and shall provide Näder Holding with documents and/or information documenting compliance upon justified request. Sanction law in the sense of this provision is the law which has been designated by the European Union, the United States, the United Nations or the country of origin of the products as the target of economic or financial sanctions.

6. Prohibition of money laundering and financing of terrorism

The business partners of Näder Holding do not directly or indirectly promote money laundering or the financing of terrorism. In this context, the applicable legal requirements, in particular the principles of the Legal Framework on Anti-Money Laundering and Counter Terrorist Financing of the European Union (Strasbourg, May 20, 2015) as well as the Financial Anti-Terrorism Act (Washington D.C., October 17, 2001) shall be complied with.

7. Handling of sensitive information and intellectual property

The business partners undertake to protect all business and trade secrets of Näder Holding, in particular from access by third parties or to keep them safe from transmission to third parties. If the business partner becomes aware that third parties have had access to the data in question or that data has been transmitted to third parties (data leakage), or if the business partner has reason to suspect such a leakage, Näder Holding will be informed immediately and provided with all information required to prevent further damage.

Our business partners also respect Näder Holding's intellectual property, including all patents, trademarks and copyrights, technical and scientific knowledge and know-how developed over the years. Confidentiality must be maintained about work and business transactions that are sensitive for Näder Holding or business partners. The direct or indirect use of non-public business information for personal advantage, for the advantage of third parties or to the disadvantage of our company is prohibited.

8. IT and information security

Each business partner is obligated to comply with the provisions of data protection law as well as any applicable legal regulations on information security. All components of information processing must be secure enough to ensure the confidentiality, integrity, availability, and verifiability of information requiring protection and to prevent unauthorized internal or external use.

II. Social responsibility

Our claim is that not only we, but also our business partners comply with human and environmental rights. Business partners must comply with the United Nations Universal Declaration of Human Rights and the eight fundamental conventions of the International Labor Organization (ILO), as well as the following specific requirements, and generally act in a manner that respects the human and labor rights of their employees. In connection with the delivery of products to Näder Holding or the performance of work for Näder Holding, the business partners of Näder Holding shall comply with all relevant laws of the respective applicable legal systems for the protection of human rights.

1. Prohibition of forced labor and slavery

In accordance with the ILO core labor standards, Näder Holding and its business partners oppose the use of forced labor, compulsory labor and (modern) slavery as defined in the German Supply Chain Sourcing Obligations Act (hereinafter LkSG). This applies in particular to the prohibition on the use of forced labor for political re-education, debt bondage, servitude or human trafficking and sexual exploitation or humiliation. All employees should be granted the right to terminate their employment relationship, subject to statutory time limits.

2. Prohibition of child labor

Näder Holding and its business partners disapprove of any form of child labor in the sense of the relevant ILO core labor standards and oppose any form of child trafficking, child prostitu-

tion and other practices that violate the rights of children and endanger their freedom and development through harmful working conditions. Children are particularly worthy of protection and must not be impaired in their development and education. Together with business partners, we stand up for the safety and health of children and protect their legal position through appropriate measures.

3. Equal Opportunities and Prohibition of Discrimination

To ensure equal opportunities and to make internationality social, the business partners of Näder Holding undertake not to tolerate any form of discrimination against employees, in particular on the basis of their age, gender, social origin, ethnic origin or skin color, political opinion, religion or ideology, sexual identity, disability or social origin.

4. Safety at work and maximum working hours

The requirements for our business partners regarding safety at work and fair working hours are, as far as relevant, mainly based on the Occupational Health and Safety Regulations (June 18, 2017). Näder Holding business partners are responsible for providing a safe and healthy work environment. They must strictly comply with all applicable occupational health and safety regulations. Business partners must also ensure that maximum working hours comply with International Labor Organization conventions and national legislation or prevailing industry standards. This means that business partners must ensure that a normal working week, including overtime, does not regularly exceed 60 hours, unless otherwise specified by applicable law or collective agreement. Universal safety standards ensure a uniform approach to occupational safety in terms of location, workplace and work equipment provided.

5. Fair and adequate living wages

Business partners must ensure that workers are paid according to industry standards, including compliance with applicable legal minimum wages and/or collective bargaining agreements, whichever is higher. Legally mandated benefits must be provided to employees. Näder Holding's business partners shall also ensure that employees are adequately compensated by paying a living minimum wage that covers at least the employees' basic needs. Business partners must take into account the cost of living and the relative standard of living of other social groups within a country. If business partners provide basic amenities to workers, they should

provide a good standard of living. These include, for example, clean and safe housing, adequate lighting, heating and ventilation, and appropriate personal space.

6. Freedom of association and right to collective bargaining

Näder Holding business partners shall respect the right of employees to freedom of association, to participate in collective bargaining, e.g. by joining trade unions, to appoint employee representatives and to join works councils in accordance with applicable local laws. Workers must be able to communicate openly and without fear of reprisal or harassment.

7. Lawful use of private and public security forces

If our business partners use their own or external security service providers, they must ensure that the security service providers respect human rights and do not act unlawfully. This includes in particular the prohibition of torture and unlawful humiliating treatment as well as the right to the integrity of life and limb and the upholding of freedom of association.

8. Respect for land rights

Näder Holding and its business partners respect the right to property and condemn any kind of illegal and human rights violating deprivation of land. This includes forced eviction or the taking of land, forests, and waters for personal gain, which could cause people or communities to lose their livelihood. Especially in planned site development, potential groups of people are considered and protection of their rights is ensured.

9. Disciplinary measures and harassment

Business Partners shall prohibit in all circumstances corporal punishment, degrading treatment, harassment, abuse, coercion or intimidation in any form. Business Partners shall not tolerate or engage in such practices and shall inform employees of applicable disciplinary procedures and actions. They must also ensure that grievance procedures are in place and communicated to all employees.

I. Ecological responsibility

Näder Holding actively accepts its share of responsibility for the sustainable protection of natural resources and the associated appropriate use of energy. We consider environmental aspects not only in the procurement of materials and raw materials used in our products, but also in all our purchasing decisions.

1. Compliance with legal requirements

Näder Holding complies with all nationally and internationally applicable regulatory requirements for the protection of the environment and strives for continuous improvement of products and processes. Our business partners are also encouraged to implement relevant requirements and to make their contribution to the protection of environmental rights.

2. Handling hazardous substances

If chemicals or other materials are released during production that pose a hazard, sufficient safety measures must be always applied when handling, transporting, storing, using, recycling or reusing these materials and disposing of them.

We encourage our business partners and associates to report violations of this Supplier Code of Ethics or other legal requirements. For this purpose, anonymous tips or complaints can be submitted via the whistleblower system in English and German.

No disciplinary action shall be taken against any employee or other person who files a complaint regarding violations of this Supplier Code of Ethics or applicable laws.

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