



**VAMED**  
health.care.vitality.

# CODE OF CONDUCT FOR BUSINESS PARTNERS

OCTOBER 2020

# TABLE OF CONTENTS

<b>PREAMBLE</b>	4
<b>01   PRINCIPLES OF BUSINESS PROCESSING</b>	5
I 01 PRINCIPLE OF EQUIVALENCE	5
I 02 PRINCIPLE OF DOCUMENTATION	5
I 03 PRINCIPLE OF TRANSPARENCY	6
I 04 PRINCIPLE OF SEPARATION	6
<b>02   FAIR COMPETITION</b>	7
I 01 COMPLIANCE WITH STATUTORY PROVISIONS	7
I 02 COMPLIANCE WITH ANTITRUST REGULATIONS	7
I 03 COMPLIANCE WITH EXPORT CONTROL AND EMBARGO REGULATIONS	8
<b>03   PREVENTION OF CORRUPTION</b>	9
I 01 BRIBERY, ADVANTAGES OR ACCEPTANCE OF GIFTS	9
I 02 GRANTING OF GIFTS	10
<b>04   PREVENTION OF MONEY LAUNDERING &amp; TERRORIST FINANCING</b>	11

05	<b>HANDLING OF DOCUMENTS &amp; INFORMATION</b>	12
I 01	PURPOSE OF THE TRANSFER	12
I 02	TRANSFER OF DOCUMENTS	12
06	<b>ACCOUNTING &amp; REPORTING</b>	13
07	<b>HEALTHY, SAFE &amp; SOCIAL WORKING ENVIRONMENT</b>	14
I 01	HEALTH AND SAFETY	14
I 02	COMPLIANCE WITH HEALTH PROTECTION REGULATIONS	15
I 03	WORK WITHOUT INTERFERENCES	15
I 04	COMPLIANCE WITH HUMAN RIGHTS	15
I 05	NO DISCRIMINATION	16
I 06	NO THREAT OR OTHER HARASSMENT	16
I 07	NO FORMS OF ILLEGAL WORK	16
08	<b>ENVIRONMENTAL PROTECTION</b>	17
I 01	SUSTAINABILITY	17
I 02	ECOLOGICAL PRINCIPLE	17
I 03	RESPONSIBLE RAW MATERIAL SUPPLY	18
09	<b>RESPONSIBILITY OF THE MANAGEMENT</b>	19
I 01	SECURING WITHIN THE COMPANY	19
I 02	SECURING IN THE SUPPLY CHAIN	19

## PREAMBLE

- A | VAMED is the leading group of companies in planning, construction and management of complex health care facilities, with the highest level of competence based on many years of worldwide experience as a partner in public health care.
- B | It is the corporate culture of VAMED to act in accordance with the law and always ethically correct. VAMED not only focuses on achieving results, but also on the way in which these results are achieved.
- C | VAMED is committed to ensuring that the ethical principles supported by the VAMED-group are also supported by its business partners. Compliance with the law is a matter of course.
- D | This VAMED-Code of Conduct for Business Partners ("Code") is a guide to these ethical principles and legal obligations. However, it does not constitute a complete set of regulations covering all applicable laws, guidelines and standards.  
If a provision of this Code deviates from statutory provisions, the provision shall apply always which, on the one hand, corresponds to the applicable body of law and, on the other hand, is the more demanding with regard to the ethical principles supported by VAMED.
- E | If a business partner violates these principles, VAMED reserves the right to decide whether to continue the business relationship.

# 01 | PRINCIPLES OF BUSINESS PROCESSING

## 01 | 01 PRINCIPLE OF EQUIVALENCE

Performance and consideration must always be in an appropriate relationship to each other.

## 01 | 02 PRINCIPLE OF DOCUMENTATION

All paid and unpaid services within the scope of business conduct and contractual relationships with our business partners are subject to written form and must be documented and archived in a suitable form.

## 01 | 03 PRINCIPLE OF TRANSPARENCY

VAMED expects that all paid and unpaid services rendered within the scope of the collaboration and their purpose will be disclosed to the responsible employee of VAMED upon request. The relevant principles (principle of equivalence, principle of documentation, principle of separation) must always be observed.

## 01 | 04 PRINCIPLE OF SEPARATION

Services for VAMED shall be clearly separated from any paid or unpaid services (e.g. cash or non-cash benefits, like, goods or services) provided to employees of VAMED. There shall be no connection between such services.

VAMED expects to be actively informed by its business partners about situations that could lead to a conflict of interest.

# 02 | FAIR COMPETITION

## 02 | 01 COMPLIANCE WITH STATUTORY PROVISIONS

All business affairs must be conducted in compliance with the legal provisions for the protection of fair competition.

No unlawful agreements may be made with business partners that have the effect or purpose of impairing competition. Not only written and verbal agreements are prohibited, but also concerted practices with the same objective.

## 02 | 02 COMPLIANCE WITH ANTITRUST REGULATIONS

The antitrust regulations applicable in the respective country, in particular when participating in joint ventures or consortia, must always be observed.

## 02 | 03 COMPLIANCE WITH EXPORT CONTROL AND EMBARGO REGULATIONS

Compliance with existing export control and embargo regulations shall be ensured.



# 03 | PREVENTION OF CORRUPTION

## 03 | 01 BRIBERY, ADVANTAGES OR ACCEPTANCE OF GIFTS

It is prohibited to demand, accept or be promised an advantage from another person for oneself or a third party for performing or omitting a legal act in breach of duty and/or to offer, promise or grant an employee or agent of a company a not merely minor advantage for that person or a third party for performing or omitting a legal act in breach of duty.

Furthermore, it is not permitted to offer, promise or grant an advantage to a public official, a politically exposed person (PEP) or an arbitrator for the performance or omission of an official business in breach of duty or for the initiation of the performance or omission of a future official business in breach of duty or for the performance or omission of an official business in accordance with duty, as well as to an expert for the rendering of an incorrect finding or expert opinion for this person or a third party.

Advantages shall not only be deemed monetary payments, but any material or immaterial benefits such as the provision of airline tickets, the giving of gifts, invitations to business meals, the assumption of hotel costs, etc.

### 03 | 02 GRANTING OF GIFTS

The granting of gifts with the intention of initiating business is not permitted.

Only customary attentions appropriate to the culture of the respective country are permissible, which do not exceed the negligibility limit according to the legal standards of the respective country and which are in accordance with the general VAMED principles.

# 04| PREVENTION OF **MONEY LAUNDERING & TERRORIST FINANCING**

Business partners must ensure that the applicable laws on the prevention of money laundering and terrorist financing are complied with.

# 05 | HANDLING OF DOCUMENTS & INFORMATION

## 05 | 01 PURPOSE OF THE TRANSFER

Technical documents and/or commercial information received from VAMED in business dealings may only be used for the purposes of cooperation with VAMED.

## 05 | 02 TRANSFER OF DOCUMENTS

Any use of these documents and information other than for the purpose of cooperation with VAMED and/or transfer to third parties is not permitted.

## 06 | ACCOUNTING & REPORTING

All documentation, accounting and data collection must be complete, orderly and correct, made on time and in accordance with legal and contractual requirements.

# 07 | HEALTHY, SAFE & SOCIAL WORKING ENVIRONMENT

## 07 | 01 HEALTH AND SAFETY

As a group active in the healthcare sector, VAMED is committed to the health and safety not only of its own employees but also of the employees of our business partners. VAMED also expects this from its business partners.

## 07 | 02 COMPLIANCE WITH HEALTH PROTECTION REGULATIONS

VAMED insists that in the course of the realization of its projects, all regulations that serve to protect the health and safety of employees and that are in line with the social values of the European Union and the applicable legislation are always complied with.

## 07 | 03 WORK WITHOUT INTERFERENCES

VAMED expects its business partners to perform their work without interference from alcohol, illegal drugs or other substances. This also applies to the taking of medically prescribed medication, insofar as this impairs the ability to work.

## 07 | 04 COMPLIANCE WITH HUMAN RIGHTS

VAMED treats all of its employees with dignity and respect, believes in the value of workplace diversity and is committed to observance of human rights. VAMED expects its business partners to feel equally committed.

## 07 | 05 NO DISCRIMINATION

VAMED expects its business partners to comply with all applicable labor laws, including the prohibition of discrimination at the workplace.

Business partners will not discriminate against any employee on the basis of race, age, gender, color, sexual orientation, ethnic origin, disability, political opinion, labor union membership, nationality, religion or marital status in hiring and terminating employment, or for career advancement through promotion, performance bonuses, salary grading and/or assignment of duties.

## 07 | 06 NO THREAT OR OTHER HARASSMENT

VAMED expects its business partners not to tolerate violence, intimidation or threats, sexual or other harassment.

## 07 | 07 NO FORMS OF ILLEGAL WORK

VAMED rejects all forms of illegal work. VAMED expects its business partners to supply goods and services that exclusively originates from legal work. VAMED condemns any form of child labor or forced labor.



# 08 | ENVIRONMENTAL PROTECTION

## 08 | 01 SUSTAINABILITY

When realizing projects, environmentally friendly service provision and sustainability must always be taken into account.

## 08 | 02 ECOLOGICAL PRINCIPLE

Within the scope of what is economically justifiable, priority must therefore always be given to ecologically valuable solutions. Legal regulations for environmental protection must be observed without restriction.

## 08 | 03 RESPONSIBLE RAW MATERIAL SUPPLY

Natural resources must always be used sparingly.

Business partners are requested to ensure that the raw materials used in the products they manufacture are not used directly or indirectly to support groups guilty of human rights violations. Business partners should take due care regarding the origin and chain of custody of these raw materials.

# 09 | RESPONSIBILITY OF THE **MANAGEMENT**

## 09 | 01 SECURING WITHIN THE COMPANY

The business partner or the management of the business partner shall take appropriate measures to ensure that the provisions of this Code are observed by its employees.

## 09 | 02 SECURING IN THE SUPPLY CHAIN

If VAMED is supplied by its business partners with goods and services which they themselves have procured from third parties, VAMED assumes that its business partners take adequate measures to ensure appropriate compliance with the provisions of this Code.



### Gender equality

We attach great importance to gender equality. We occasionally only use the masculine form in the interests of improved readability. However, any personal designations apply equally to both women and men.



**VAMED**  
health.care.vitality.

[www.vamed.com](http://www.vamed.com)