



Declaration of Principles on Sustainability and Human Rights

NEUROMEDEX GmbH

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PREAMBLE

Medical technology is indispensable for people's health care. In the production and distribution of medical devices, the livelihoods of all people must be kept in mind and human rights must be comprehensively respected and ensured.

The aspect of sustainability is of great importance for the healthcare industry and medical care. This policy statement of Neuromedex considers the essential legal regulations that are associated with it in social, ecological and economic terms, as well as the necessary corporate organizational structures ("governance"). It is intended to provide Neuromedex with an orientation on sustainability issues and at the same time to clarify Neuromedex's understanding of sustainability to business partners.

In the context of social sustainability, we state that we have an influence – directly or indirectly – on the living conditions of our employees, the employees of our suppliers as well as our service providers and customers. We strive to identify the influences of our business behaviour on these groups of people and to avoid or, where not possible, at least limit negative effects.

Ecological sustainability means that, as far as possible, we only use the natural foundations of life and resources during our economic activities to the extent that they are actually needed. Furthermore, we strive to conserve natural resources, for example in the use and manufacture of products, the service life of their products and the (re)recycling of substances, provided that this does not have a negative impact on the unrestricted functionality and availability of medical devices for patients.

Economic sustainability stipulates that the economic activity and objectives of our company take into account other criteria, such as environmental and social aspects, in addition to the principle of making a profit.

When designing our governance, we consider that it can contribute to safeguarding ecological and social concerns and that it has the necessary control measures of the responsible corporate bodies.

In implementing this Declaration of Principles, we are guided in particular by the following three basic principles:

- In accordance with the principle of equality, we are committed to granting indiscriminate access to medical devices and related health services that is not linked to origin, social status or comparable characteristics for which we are not responsible, such as physical limitations. On the other hand, this principle also applies in the context of working conditions, so that comparable situations may not be treated unequally without good reason. In particular, remuneration should not differentiate according to gender.
- In accordance with the principle of priority, we are committed to the priority of the careful use of resources (Reduce – Reuse – Recycle) and the establishment and follow-up of efficient processes, insofar as this makes economic sense.
- Under the precautionary principle, we take preventive measures to avoid or minimize the negative environmental and social impacts of our economic activities.



In addition, Neuromedex is committed to respecting the human rights of the following recognized frameworks and standards, which are incorporated into our following principles:

- UN Charter of Human Rights
- UN Guiding Principle on Business and Human Rights
- UN Convention on the Rights of the Child
- UN Convention on the Rights of Women
- Conventions and recommendations of the International Labour Organization (ILO) on labour and social standards
- The principles of the United Nations Global Compact (UNGC)
- Charter of Fundamental Rights of the European Union



PART I: SCOPE AND PRINCIPLES

§ 1 Scope of application

- (1) This Declaration of Principles obliges Neuromedex and its affiliated companies in Germany.
- (2) If individual sustainability-related requirements are not legally binding for our company, for example because we do not exceed a certain size threshold, we nevertheless make reasonable efforts to achieve the underlying sustainability goals.

§ 2 Selection of third parties

- (1) This Declaration of Principles shall also apply to us within the framework of the statutory provisions if we commission third parties to design or carry out the activities covered by this Declaration of Principles for us. We will carefully select and review these third parties, adequately inform them of their obligations under this Policy Statement and, if necessary, commit them in writing to comply with them. They should work in an appropriate manner to ensure that other natural or legal persons with whom they work (e.g. joint venture partners, licensees) also comply with the minimum standards set out in this policy statement.
- (2) We will work to ensure that our affiliated companies also comply with the obligations under this Declaration of Principles.

§ 3 Characteristics of sustainability

We are of the opinion that a long-term and comprehensive sustainability of our actions can only be achieved if we not only strive for economic aspects in the sense of mere profit maximization, but also include social and ecological aspects in our corporate decisions.

PART II: SOCIAL SUSTAINABILITY

§ 4 Compliance with occupational health and safety obligations

Compliance with the occupational health and safety obligations applicable at the place of employment, in particular to reduce the risk of accidents at the workplace and other work-related health risks, is essential for us as a manifestation of the precautionary principle. For this reason, we provide our employees with the necessary protective equipment and safe workplaces. We comply with applicable working time laws to protect our employees from physical and mental fatigue. Our company is committed to ensuring that our direct suppliers also observe the applicable occupational health and safety obligations and adequately address compliance with them along their own supply chain.

§ 5 Promotion of diversity and inclusion

We are committed to an appreciative, inclusive and equal work environment that reflects the individual and collective diversity of our employees. The needs of all employment groups within the company as well as the needs of customers and patients are considered as far as possible in business decisions and the development of new innovations.

§ 6 Non-discrimination

In accordance with the principle of equality, we condemn any form of discrimination based on gender, ethnic origin, language, nationality, religious or political belief, physical or mental disability, age, marital status, sexual orientation, gender identity or any other characteristic protected by applicable law. Economic decisions are made free of any discrimination.

§ 7 Payment of an appropriate and equal wage

The payment of the minimum wage applicable at the respective place of employment is the basis of every employment relationship. Equal work should be paid equally for all genders, in accordance with applicable law and the principle of equality, if it is carried out under the same circumstances.

§ 8 Freedom of association

Our company recognizes freedom of association. This includes, in particular, the freedom of our employees to organise and participate in trade unions and the right to set up works councils in accordance with applicable law.

§ 9 Prohibition of slavery, forced labour and child labour

Any form of slavery, child labour and forced labour is strictly prohibited. We take all necessary steps to eliminate all forms of slavery, child labour and forced labour in our own business areas. We are working to address this ban appropriately and effectively in our supply chains.

PART III: ENVIRONMENTAL SUSTAINABILITY

§ 10 Resource conservation

We continuously strive to make our entire activities and business processes as resource efficient as possible. We implement economically viable opportunities for improvement in an appropriate manner.

§ 11 Reduction of CO2 emissions

Our company is committed to a continuous reduction of CO2 emissions generated in our own production facilities and by our actions, as well as to the gradual transition to renewable energies.

§ 12 Waste reduction and recycling

We are constantly working to minimize the waste in our own operations and the environmental impact of our products. The principle of precedence applies, i.e. "reduce" before "reuse" before "recycle". Furthermore, when developing new products, we will strive to use products that can be used repeatedly and/or made from recycled materials, insofar as this is legally permissible, possible from a sterility point of view and economically viable. The safety of patients and users is the top priority.

§ 13 Prevention of environmental pollution

(1) Within the framework of applicable law, our company minimizes any form of environmental pollution, such as harmful soil changes, water and air pollution or noise emissions, which impairs the natural basis for the preservation and production of food, denies people access to fresh drinking water or otherwise harms human and animal health.

(2) Within the framework of applicable law, we take into account the complete life cycle in the design of our products and processes and strive to minimize adverse effects of our products after use with regard to the environment.

PART IV: ECONOMIC SUSTAINABILITY AND GOVERNANCE

§ 14 Responsible corporate governance and strategy

- (1) In our business decisions, we consider the basic idea of sustainability.
- (2) Our company develops strategies for the effective, internal implementation of the objectives of this policy statement. These strategies shall include, where relevant, concrete measures to ensure that our corporate structure is in line with this Statement of Principles.
- (3) In order to enable effective and efficient implementation of the sustainability goals set out in this policy statement, we regularly review our internal corporate procedures and management processes.

§ 15 Anti-Corruption Statement

In an increasingly competitive world, integrity has become a value that is highly valued by our customers, business partners, employees and Neuromedex.

Therefore, Neuromedex does not tolerate corruption and stands behind the UN Global Compact (UNGC).

We also expect third parties who interact with Neuromedex to comply with the principles described.

§ 16 Sustainable and transparent supply chains

As a rule, the production of medical devices does not take place in one place. Rather, there is often a global supply chain behind medical devices. We are aware that long-term sustainable production and provision of medical devices can only be achieved if the entire supply chain is also sustainable.

Although we are not covered by the Supply Chain Due Diligence Act, we strive to comply with and pass on the principles accordingly. We communicate our sustainability-related expectations to our direct suppliers and take sustainability-related aspects into account when selecting direct suppliers.



PART V: FINAL PROVISION

§ 17 Regular analysis of progress

Compliance with this policy statement and its effective implementation is a priority for our companies. We will therefore regularly review progress in implementing the Declaration of Principles.

§ 18 Entry into force

This policy statement comes into force from 01.10.2023.

Marco Geyer
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