

NEOEMKI National Medical Device Conformity Assessment and Certification Ltd.

Code of Ethics and Business Conduct

Management Message

„ Our commitment to ethical conduct and a strong ethical foundation are among the most important elements of our Company's operations. We are committed to conducting business in a fair and ethical manner, based on an ethical culture and compliance.

In the long term, we can only meet the challenges of a competitive market by taking moral responsibility for our principles, both as individuals and as a company. Our employees must always act legally, ethically and in the best interests of the Company.

Our business philosophy is based on offering carefully designed, fairly priced and high-quality services. We always keep fairness and honesty in mind.

We only work with service providers that have an impeccable record of respecting human rights and compliance rules

We constantly monitor our activities to ensure that our overall operations comply with our Code.”

1. Introduction

This is the Code of Ethics and Business Conduct of NEOEMKI National Medical Device Conformity Assessment and Certification Ltd., which contains our ethical commitment and serves as a guide for all our employees to develop appropriate business conduct.

This document applies to all staff who work for the Company (including managers, employees, trainees, subcontractors and consultants) and to organizations with whom we do business.

The Company expects staff to be impartial and honest in all matters relating to their work. All staff are responsible for acting in general good faith and for not doing anything to undermine the trust and confidence necessary for a working relationship.

The success of our business is based on the trust we receive from our employees and our customers. Commitment to integrity means that we will only achieve our goals in an ethical manner.

All staff are expected to abide by this Code, both in their professional and personal conduct, and to treat everyone with respect, honesty and fairness.

The company is constantly open to all questions and will not tolerate any punishment or retaliation against anyone who in good faith reports inappropriate behaviour.

Leaders have a special responsibility to demonstrate the importance of this Code through their behaviour. Managers are responsible for addressing any ethical issues or concerns raised in a timely manner. Employees have a duty to cooperate in any investigation of possible or alleged ethical misconduct.

Conduct that does not comply with the Code may be considered a misconduct that could lead to disciplinary action (adverse legal action) and, in justified cases, termination of employment.

We apply our values and standards to our suppliers, subcontractors, service providers and partners.

2. Ethical values

The core values of the Company:

Independent, impartial and objective decisions

Responsibility for our clients

High level of professional knowledge

3. Ethical decision-making

Ethical behaviour also means value-driven decision-making.

In identifying an unethical, inappropriate or illegal situation, the following questions need to be clarified before a decision is made:

- legal, consistent with the company's values (complies with the Code and other rules/regulations)
- it is right, it does not infringe the rights of others, it is in line with my own values
- publicly acceptable
- the basis of the decision is factually correct

4. Compliance with legislation

Our commitment to fairness starts with respect for the law and other legislation. We know and comply with the laws and regulations that are necessary to do business legally.

We will comply with all our valid contractual obligations and will not abuse our rights.

Our staff must always comply with all laws and regulations, including the Code, and ensure they operate in accordance with them.

5. Sustainability

We are committed to meeting our current needs without compromising the opportunities of future generations. We therefore consider economic, environmental and social factors in our operations and business decisions.

6. Human rights

We are committed to respecting the dignity and human rights of all people and communities with whom we come into contact in the course of our work. We do not cause or contribute to human rights violations in any form. Our staff are committed to treating everyone with dignity, respect and care and to upholding their human rights.

7. Fair employment and working conditions

We are committed to promoting equality in the workplace and to achieving legal and fair employment and remuneration practices. We condemn all forms of unlawful, unfair or unethical employment that exploits the workforce, destroys the social security system or is used for tax evasion.

Our staff must behave fairly and treat their colleagues and others with full respect.

8. Discrimination and harassment

We ensure equal opportunities in employment and do not tolerate any form of discrimination, harassment or rude treatment.

Direct or indirect discrimination based on any professionally irrelevant characteristic or circumstance is not permitted. Any discriminatory behaviour, harassment, intimidation or bullying is prohibited.

All staff are expected to adhere to the highest standards of mutually respectful behaviour in all their verbal and written communications and to refrain from harassment, defamation or any behaviour that others may consider violent, intimidating, humiliating or offensive.

9. Health, safety and environment

We provide a clean, safe and healthy working environment and are committed to maintaining a healthy environment.

Staff must always comply with all relevant health, safety and environmental legislation, rules and regulations.

10. Fair competition and business

Our cooperation with our partners is based on trust and mutual benefits in line with competition law. We are committed to ethical and fair competition, as we sell our products and services on the basis of quality, suitability and competitive prices.

We make our own pricing and sales decisions, and we do not cooperate or coordinate our operations with competitors in any prohibited manner. We refrain from conduct that harms competition or the reputation or credibility of our partners or competitors.

We do not offer or solicit illegal payments or favours, engage in illegal activities or unlawful agreements to exclude certain customers.

We are committed to respecting all applicable trade regulations, restrictions, sanctions and import-export embargoes.

We do not allow behaviour that violates fair competition in tenders and competitive negotiations.

Our staff are responsible for ensuring fair business practices in their work and for complying with all competition, consumer protection and advertising rules.

In all cases, customers and business partners must be treated fairly and equally, services must be presented fairly and accurately (fair marketing and advertising) and all relevant information must be shared.

11. Anti-corruption

We strongly condemn and will not tolerate corruption in any form.

We may not, directly or indirectly, offer, promise, give, give, solicit or accept any unfair advantage or benefit for any commercial purpose.

An unfair advantage or benefit can be money, a cash substitute (e.g. a voucher), a gift, a credit line, a discount, travel, a personal benefit, accommodation or a service.

In order to ensure or expedite due process, we do not allow the allocation of slush funds to officials or employees of economic operators.

Corruption also includes influence peddling, where someone gives the impression that they are influencing a decision-maker dishonestly.

Corruption, whether for commercial gain or other economic advantage, is a serious abuse. Similarly, accepting a bribe or allowing another to accept a bribe is a serious offence. Our staff must be able to account for any benefits they have gained in the course of doing business and are prohibited from giving or accepting bribes of any kind or behaving in any other corrupt manner.

12. Gifts and hospitality

We must avoid any behaviour that could give the impression that we seek, receive or give preferential treatment in return for personal benefits.

Business courtesies or favours can be gifts, favours, meals, drinks, entertainment or other benefits from a person or company with whom we do or may do business. We will not give or accept anything that constitutes, or reasonably appears to constitute, an unfair business inducement, or that violates any law, regulation or principle, or otherwise creates an embarrassing/uncomfortable situation. Our staff should never use personal resources for anything that could not be done with company resources.

Occasional gifts or hospitality that are customary and consistent with reasonable market ethics may be offered and accepted if they are not excessive, frequent or often given and do not give the impression that they are intended to influence business decisions.

Only low-value, insignificant gifts are accepted.

All other gifts must be politely declined or, if sent by post, returned. If return is not possible, it should be donated to charity or community use.

It is the responsibility of the giver or the person receiving the gift to consider whether a gift is appropriate.

13. Property protection and the proper use of company assets

We are responsible for the safety, security and economic use of the Company's resources. Our resources, including time, materials, equipment and information, may only be used for legitimate business purposes.

Private use is allowed if it is not unlawful and if it does not affect performance or undermine morale.

All staff must observe security measures and treat both tangible and intangible company assets with respect, not misuse or neglect them

14. Confidentiality, information security, trade secrets and intellectual property protection

We are committed to ensuring the integrity, confidentiality and accessibility of business information and therefore have appropriate technical security arrangements in place, which all staff are responsible for maintaining.

A trade secret includes any information that has not yet been disclosed and that would be harmful to the company or its customers or business partners if it were to become available to unauthorised persons. All staff are required to keep such information confidential. This includes that no person shall trade in a security while in possession of non-public information that could affect the price of the security or share such information with others.

All information security rules must always be respected.

We respect the intellectual property of others. We will not obtain or seek to obtain trade secrets or other proprietary or confidential information by improper means. We will not engage in unauthorized use, copying, distribution or modification of protected intellectual property.

15. Accounting, fair reporting and financial integrity

We keep and prepare our bookkeeping, records, accounts and financial reports in sufficient detail, accurately and fairly to reflect our transactions. We deplore all forms of money laundering and are committed to doing business only with partners who conduct legitimate business from legitimate sources.

We are committed to fair taxation and refrain from any tax avoidance practices. All staff are required to follow all accounting procedures and ensure that financial events are properly recorded and documented, and that the financial statements they communicate are complete, honest, accurate, timely and understandable.

Unfair influence, manipulation or misrepresentation of the audit or any accounting control is prohibited.

16. Fraud prevention

Fraud or fraudulent behaviour - i.e. cheating, stealing, deceiving or lying - is unethical and in most cases punishable. All forms of fraud (including, for example, false accounting, falsification or alteration of certificates or financial documents, misuse or misappropriation of company assets, false entries in financial or non-financial records or reports) are prohibited.

17. Conflict of interest

Our decisions must be based on objective and fair assessment and avoid any possibility of unfair influence. A "conflict of interest" may arise where an employee's personal interests conflict, or have the potential to conflict, with the interests of the Company.

18. Data protection, personal data protection

We respect everyone's rights to privacy and recognize the need of our customers, employees and other natural persons to be confident that their personal data is processed fairly and only for legitimate business purposes. We are committed to complying with data protection legislation. We will only obtain and process personal data that is necessary and provide appropriate information to the persons concerned about these activities. We take appropriate information security measures to ensure the confidentiality, integrity and availability of personal data.

Our staff are required to follow the relevant legal requirements, adopt good practices and comply with procedures to ensure the lawfulness of data management and processing.