

Code of Conduct

Security, orientation and trust

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Quality for life

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Table of contents

A note from the Executive Board

1. The Ottobock brand is a promise of quality	4
2. Respect and trust do not exclude anyone	4
3. Property is protected	5
4. The value system forbids corruption in any form	5
5. Private interests must be separated from company interests – no conflicts of interest	5
6. Fair competition is indispensable	6
7. Sensitive information must be handled discreetly	6
8. The economy and ecology go hand in hand	7
9. Employee health must be promoted	7
10. Social responsibility sets our company apart	7

Scope

This code of conduct applies for all employees and companies of the Ottobock Group worldwide, and for all companies in which Ottobock companies hold a direct or indirect capital share of more than 50%.

A note from the Executive Board

Dear Employees,

Ethical principles are categorical and universal in their application. All freedoms, including entrepreneurial freedom, are based on such ethical principles as well as binding rules. Without them, we would not have a reliable framework for responsible economic activity.

They define the scope of action that establishes security, orientation and trust. There have been several striking turning points since the year 1919 when the history of our company began in Berlin. Agreement on the correct course for the future was only possible in these situations because there was a common understanding of the rules, principles and values. This aided us like a compass in heavy seas. It made us successful and we will continue to be so in the future.

Due to this lasting effect, we have written down a general code of conduct that is of overriding importance. It serves as the binding standard for all companies in the Ottobock Group. They are required to implement these general guidelines in concrete terms, ensuring that all employees have an unambiguous roadmap for their daily actions.

The group is a worldwide network and therefore encompasses various cultures, traditions and market conditions. No matter in what country an employee works for Ottobock, he knows that there are common, solid principles that apply to that employee and all other members of the Ottobock family.

Our code of conduct is defined in greater detail in the following. Living up to this canon of values in our day-to-day work is an essential element of the Ottobock Group's successful company history. We can be proud of that. By anchoring ethics in the economics of our company with a binding code of conduct, we are continuing down this successful path.

Professor Hans Georg Näder

In principle, each and every employee of the Ottobock Group takes responsibility for his own actions and behaviours. The values and code of conduct defined by the Ottobock Group must be consistently taken into account in all conscience. Our interactions defined by trust, fairness and respect solidify the foundation for integrity and honesty.

By taking into account international standards for human rights, employment, environmental protection and anti-corruption, Ottobock with its code of conduct follows the universally recognised principles of the United Nations Global Compact.

www.unglobalcompact.org

The code of conduct encompasses the following ten principles:

1. The Ottobock brand is a promise of quality

All around the world, the companies of the Ottobock Group stand for high quality and technologically outstanding products and services. With this quality promise, we consciously assume a high level of responsibility extending from research and development to production and inspection to sales and customer service.

In accordance with the maxim of our company founder Otto Bock – that the most important standard of quality is the positive effect for the user of our products – the needs of the user continue to come first for our quality management today.

In order to keep up with the accelerated pace of technological progress, we continuously invest in the training and continuing education of all skilled workers. Employee actions are defined by the principle of reliably meeting the quality promise at all times.

2. Respect and trust do not exclude anyone

As an internationally positioned employer, we place great emphasis on multicultural interaction based on respect and trust. We experience team diversity as a benefit and bring together people with different experiences, convictions and perspectives.

To ensure equal opportunities and shape the social aspect of our international presence, we do not tolerate any employee discrimination, in particular not based on age, gender, ethnicity, origins, religion, ideology, sexual identity, disability or social background.

3. Property is protected

Employees take care of the company's material assets. They use the company's property exclusively for business purposes and handle it with due care and diligence.

Company property may not be sold, loaned or used for non-business purposes except with express permission, regardless of its condition or value.

4. The value system forbids corruption in any form

Our company owes its outstanding position in the international market to innovative products, problem solving expertise and excellent services to accompany our products. Our competitive advantage based on technology and quality not only makes resorting to corruption unnecessary; corrupt practices also contradict the standard we impose on ourselves for fair and purely performance-based competition.

Our company's position can only be maintained and defended against competitors if we are willing to continuously develop innovations and transform them into marketable products. Corruption is therefore counterproductive and prevents a realistic assessment of the competitiveness of our products and services.

Detailed rules for preventing and fighting corruption are defined in the guideline "**Anti-Corruption & Conduct in the Course of Business**". Internal control systems document the business processes and ensure the transparency of decision making.

5. Private interests must be separated from company interests – no conflicts of interest

All employees must separate their private interests from those of the company at all times.

Any situation where an employee could come into conflict with her private interests in the service of the company – or even just the impression of this – has to be avoided.

If there are business contacts that bear the risk of such a conflict of interests, full disclosure is mandatory.

Substantial investments, also of close family members, in a competitor, customer or supplier shall be reported to the respective superior in writing.

6. Fair competition is indispensable

Undistorted competition is not only one of our company's objectives, but is also in the interest of the overall community. It establishes a reliable framework for economic development. Competition and antitrust laws form the legal basis for equal opportunities and fair competition. Each and every employee is obligated to comply with them. In particular, there is an obligation to comply with the ban on price fixing and capacity agreements, arrangements to share customers, territories or markets with competitors, issuing sham offers, refraining from competition and inappropriately advantaging or disadvantaging business partners.

7. Sensitive information must be handled discreetly

The protection of confidential, secret and personal information is part of the principles in all our relations with colleagues (including former ones) as well as their families, with job applicants, customers, suppliers and other people.

Personal information may only be collected, processed or used where this is required for clearly defined and lawful purposes. Our company ensures that the use of data is transparent to those concerned and that their rights to information and correction are protected.

Every employee is obligated to comply with the provision on data protection as well as the statutory and corporate rules on information security. Furthermore, they are obligated to protect data entrusted to our company against misuse. Our company undertakes to guarantee an appropriate standard in securing information processing. All components of information processing must be secured in such a way that the confidentiality, integrity, availability and verifiability of the protected information is given, thus preventing any unauthorised internal or external use thereof.

Business and trade secrets are strictly confidential. This principle also needs to be observed for protecting the information of our business partners. Processes and transactions in the company that are sensitive for us or our business partners must be kept confidential. The direct or indirect use of business information that is not available to the general public for personal gain, the benefit of third parties or the detriment of our company is prohibited.

The obligation to comply with all the points above continues to apply beyond the duration of the active employment relationship.

8. The economy and ecology go hand in hand

Our company actively lives up to its shared responsibility to effectively protect natural resources. In the company's production processes, Energy Management is continuously examining the integration of further technologies to reduce consumption. The recycling of resources and the responsible handling of harmful substances are elementary components of our actions as well. We consciously contribute to improved environmental protection. Ecological production is an essential element of sustained business success for us.

9. Employee health must be promoted

As an expression of appreciation and fairness towards our employees, our company lives up to its responsibility to prevent illness and to facilitate returning to work after lost time. Preventive measures for the good of the employees are promoted as well. Strict compliance with all health, occupational safety and working hours regulations is mandatory. Since a good working

environment can also make a significant contribution to the prevention of occupational illnesses, managers are asked to promote a constructive atmosphere.

10. Social responsibility sets our company apart

Our company acts as a sponsor and promoter, thereby embodying the principle of taking shared social responsibility beyond its role as an economic player. Projects that are supported may range from initiatives to improve the attractiveness of sites to international cooperation agreements.

Notice of equal treatment

To improve readability, using both the male and female forms of speech is omitted. All designations apply equally to either gender.