



Code of Conduct of the A.Vogel Group

Basic behavior and responsibilities

Basic behavior

We operate in a highly regulated environment. We comply with legal and regulatory requirements and external and internal policies in all areas of our business, including sales and marketing, R&D and registration, purchasing and production, quality assurance and human resources, environmental sector, finance and tax, data and information. We prevent noncompliance by proactively avoiding noncompliance risks – whenever possible. We are aware that noncompliance can entail consequences, such as warnings, fines to individuals or the company, or risks to the continued existence of the A.Vogel Group.

Reporting of misconduct

As misconduct is considered to be any behavior that violates the conduct stated in the Code of Conduct (i.e. against "compliance"). It must always be addressed actively.

Employees must report any possible misconduct to direct or indirect line managers, and if necessary, to the management of human resources, the CEO, or even up to the president of the Board of Directors.

We handle such reports confidentially. In addition, we protect employees who report possible misconduct, provide information about it, or in any way contribute to an appropriate review or investigation, from retaliation.

Ethical basis for our behavior

Ethical behavior is based on the sense of responsibility of us all. Honesty, fairness, and integrity in behavior are essential for our business. If they are missing, our reputation is damaged.

We commit ourselves to the same standards of ethical behavior and compliance – wherever we do business.

We do not tolerate any form of corruption. We do not bribe individuals or public officials and do not accept bribes.

We disclose potential or perceived conflicts of interest.

We respect human rights in our businesses, in our business operations, and in the communities within which we work.

We act in a politically and denominationally neutral manner and abstain from any derogatory remarks or attitudes that would challenge the integrity and dignity of individuals and communities.

We promote and protect scientific integrity and medical research.

All data, information, reports, and statements for which we are responsible must be correct, true, accurate, fair, and must not mislead or distort facts. This applies to all types of records, such as annual and financial reports, research and development data, expense reports, and emails.

We treat confidential and personal data entrusted to us by third parties with confidentiality. We ensure that our external service providers are also committed to this.



Additional information regarding What We Offer

Customers

With the highest level of customer satisfaction as our goal, we take measures to ensure an uninterrupted supply of our products and services to our customers.

Consumer Safety: We report adverse events, within the legally prescribed time limits, to those responsible for product safety and quality defects (complaints) and – if required by law – forward them on to the regulatory authorities.

Business Partners

Our business partners comply with our values and our ethical principles.

We choose our partners based on their competence, integrity and performance, as well as whether they have the necessary licenses. We ensure that they comply with the contractually agreed standards throughout our business relationship.

Information and Marketing

Compliance is a must for information that we send to the specialist groups (e.g., product-related information). This also applies to information for consumers in our printed products (e.g. Gesundheits-Nachrichten) and the digital media (i.e. website, social media), as well as to information for third parties (i.e. press releases, annual report).

Social Media

The creation and operation of external communication channels on behalf of the A.Vogel Group (e.g., Facebook, Twitter, Instagram, YouTube) is generally reserved for the communication managers of the A.Vogel Group. These employees are trained to monitor the channels for adverse events and product complaints.

Employees do not need to register private social media accounts. However, their communication in such channels must not have a negative impact on the company. Communication about our products is highly regulated, therefore posting comments about our products is to be avoided.

In addition, we have a guideline that regulates the communication of the A.Vogel Group products by employees. It takes into account the latest trends in social media.

Additional information regarding Quality/Environment

We do not carry out animal testing within our operations. If approval regulations require such, we award contracts to third-party companies with expertise in minimally invasive procedures.

We protect nature, our most important raw material supplier! We minimize CO2 emission, water consumption, and waste in our operations. In energy management, we continue to be proactive (i.e. recovery of water and heat).

Medicinal plants are organically grown whenever possible. In addition, we promote natural habitats and measures to increase biodiversity in our farms.

Additional information regarding Employees

General

We create permanent jobs where all employees have an equal chance to succeed.

We promote the maintenance of health and safety at work and avoid risks.

We value the work of all our employees and offer them professional development and further training opportunities according to their individual abilities.

We take into account the performance of our employees in achieving their targets, adhering to the values of our company and by their behavior.

We pay fair, market-based wages and do not tolerate wage discrimination, for example, based on gender.

We promote an inclusive working environment in which our employees, regardless of their personal background (such as ethnicity, nationality, health condition), can make a full contribution and respectfully express their opinions.

We do not tolerate discrimination, harassment, retaliation, discourtesy, and bullying.

Use of electronic means of communication

We only conduct business communications via company-owned electronic means of communication or as, for example, a VDI client on the company's server. In the latter case, all data can be accessed from the VDI.

In addition, we have a guideline that regulates the use of computer resources and personal devices. It takes into account the latest trends in information technology.

Additional information regarding Independence

We carefully examine financial risks and investments and rely on timely, complete, accurate, and effectively controlled financial information.

We protect our assets, including our reputation, intellectual property rights, data, information, products, and real estate from misuse, loss, theft, and waste. We ensure the confidentiality of sensitive data and information.

We respect the intellectual property of others. Intellectual property that is created, developed, or acquired by employees in the course of their employment belongs to our company.

Dictionary/Glossary

Laws:	Laws and regulations issued by the competent corporation, which apply to us.
Guidelines:	External and internal guidelines such as Good Manufacturing Practice (GMP), Good Distribution Practice (GDP), Good Clinical Practice (GCP), but also our internal rules and guidelines, for mandatory directives and regulations.
Stakeholder:	Any person who can assert interests towards an organization. This includes customers, employees, suppliers, shareholders. Collective stakeholders are the society (i.e., political communities) and the environment (nature). In practice, their claim is only manifested by the awareness of individual stakeholders.