University Hospital Bonn

Code of Conduct

Compliance Office contact:

Internal Audit & Compliance Department Building A01

Venusberg-Campus 1, 53127 Bonn

Contact:Andreas Heiden, Head of Department and Compliance OfficerTel.0228 - 287-13563E-Mailandreas.heiden@ukbonn.de

Martina Köster, Deputy Head of DepartmentTel.0228 - 287-13562E-Mailmartina.koester@ukbonn.de



Preamble

The University Hospital Bonn is oriented to the well-being of the people entrusted to it and of its employees. (From the guiding principles of UKB)

What does make a hospital successful? Excellent performance in the areas of patient care, research, and teaching surely do constitute a solid basis, but are not the only factors that determine success or failure.

Bad reputation might compromise the success of our hospital. Therefore, not only an excellent performance based on combination of patient care, research, and teaching must be ensured, but also the collective adherence to current law regulations.

Being a prominent healthcare institution, UKB is aware of its social responsibility. The dignity of all our patients and employees is particularly important to us. Any form of discrimination will not be tolerated.

The present Code of Conduct should provide a guiding framework, which defines the requirements for law compliant and honest behavior. Among the values promoted by the Code of Conduct can be found fairness, mutual respect, recognition, and appreciation in daily interactions with our colleagues, patients, contractual partners, and the public sphere.

The Code of Conduct is a referring document for all the members of the Executive Board, directors, managers, and employees of UKB and its subsidiaries. It also applies to temporary workers, i.e., individuals working at the hospital that can be seen as employees. In fact, as previously mentioned, the Code of Conduct provides an overview of UKB's values and behavioral requirements for all UKB's employees. Additional internal regulations can be defined, if needed.

Nevertheless, the merely existence of a Code of Conduct is not sufficient - role models are needed as well. This responsibility is taken over by managers, who set the example of an adequate behavior and ensure that UKB's employees are informed about the Code of Conduct and understand its principles.

Bonn, September 26, 2023

The Executive Board

Table of content

1.	Our goal – the highest possible quality of medical, nursing, and other services	4
2.	General principles	4
3.	Dealing with patients and partners	5
	Rewards, gifts, and hospitality	6
	Sponsoring	6
	Donations	6
	Remuneration for provided services	6
	Research and teaching	6
4.	Handling with UKB's property	7
5.	Social responsibility	7
6.	Code of Conduct implementation and violations reporting	8

1. Our goal – the highest possible quality of medical, nursing, and other services

The high quality of our services is indispensable for the well-being of our patients. Therefore, we are committed to define and organize our processes and qualify our employees in such a way to ensure compliance with the latest safety laws and regulations.

All services must be provided by competent staff members. Since professional negligence at a hospital can have particularly serious consequences, we apply the highest quality standards to all internal and external processes, which are constantly monitored by our central quality management. In order to guarantee our patients the best possible experience, the identified deficiencies must be immediately reported to allow any necessary corrective measures to take place. UKB has also arranged an early detection system for reporting "critical incidents" (CIRS).

As a maximum care hospital, the University Hospital Bonn operates at the highest level in all areas.



Providing the best medical care for our patients is a matter of personal responsibility for all our physicians. Such a responsibility cannot be anyhow limited by any authority. Unequal treatment will not be tolerated at UKB.

As a maximum-care university hospital, we contribute to shape medical progress and developments in the early detection, acute treatment, and long-term therapy through studies and high-quality research projects. All the applicable ethical, medical, and legal requirements are constantly and demonstrably implemented.

We are committed to continuously improve all medical and supporting activities at UKB.

2. General principles

We always adhere to the law and fulfill our contractual obligations and promises to all patients, funding organizations, health insurances, and subsidizers. A trustworthy, considerate attitude constitute the basis of our work. Our interactions with colleagues and

contractual partners are always trustworthy and open, correct and honest, and characterized by fairness, respect, and responsibility. People of various nationalities, and with different cultural and religious backgrounds work together at UKB. Our hospital does not tolerate any discrimination based on origin, gender, disability, age, religion, political beliefs, sexual identity, or similar



reasons. We respect the privacy, personality, and dignity of every single individual.

Our corporate culture is based on transparency, gratitude, and trust.

Personal relationships or interests should never influence professional decisions. Our employees make sure to avoid behaviors or statements - both in the professional and private sphere - that might damage UKB's reputation.

Violations of legal, contractual and governmental regulations, as well as internal rules might have legal consequences, including termination of employment. Additionally, compensation claims and criminal sanctions might be applied under certain circumstances.

3. Dealing with patients and partners

The health and interests of our patients always constitute a priority for us. We treat our patients with respect and inform them promptly about the planned measures and procedures in a comprehensible and empathic way. We strive for maintaining our hospital's high quality and safety level, based on our social and professional competence, continuous further development and staff



training, and latest scientific findings. All UKB's employees should be aware of the resulting responsibility. Particular importance is being attributed to following professional standards and hygiene regulations.

The employees of University Hospital Bonn respect the dignity and the will of the patients and base their actions on patients' well-being.



We treat all our business partners professionally and equally. Therefore, all our contractual relationships are transparent, and our tenders and settlements are traceable. At UKB we do not tolerate any activity, which might be initiated or carried on by unfair means. We select our partners very carefully and apply the principle of objectivity. Furthermore, we only work with partners who

themselves comply with these regulations.

We work fairly and constructively with our partners.

Each employee should always act in the best interest of UKB and clearly separate own interests from those of the hospital when making decisions. In order to avoid conflicts of interest in daily operations, UKB has introduced a series of controlling processes such as, for example, the preliminary assessment of secondary employments. To keep the trust of our patients,



business partners, and the public, UKB resolutely rejects any form of corruption. Even giving the impression of a corrupted behavior must be avoided.

The professional and social competence of UKB's employees contribute to the success of University Hospital Bonn.

In concrete terms, our business partners cannot be offered, granted or promised any benefits, either directly or indirectly, which could compromise a fair and objective decisionmaking process. Employees are not allowed to demand or accept any benefits, which might lead to a biased decision.

Rewards, gifts, and hospitality

The acceptance of rewards, gifts, hospitality, invitations, and other benefits which might be connected with daily operations at the hospital is only permitted in exceptional cases. Moreover, it must be adequate to the circumstances, be of secondary importance, and have no influence on professional decisions. The same principle applies to repaying the courtesy. More information about these regulations can be found in UKB's anti-corruption policy.

Sponsoring

At UKB we understand sponsoring as the activity of granting money or providing benefits of monetary value, done by companies or individuals that wish to promote scientific and social projects. Sponsors usually follow their own interests. In order to achieve the highest possible transparency level, each sponsorship must be documented with a contract. Moreover, the sponsored amount must be in reasonable proportion to the provided services. Any potential influence on the procurement, medical prescriptions or allocation decisions must be avoided.

The reputation of UKB and the trust in its absolute independence and neutrality both in patient treatment an in research should not be compromised by any sponsoring campaign. The corresponding internal regulations must be observed.

Donations

Donations are charity contributions given on a voluntary basis with the scope of promoting tax-exempted projects, foreseen by UKB's Articles of Association. Donations can be done in monetary or non-monetary form.

We always openly thank all our sponsors! For the sake of neutrality, any doubt that donations are associated with some kind of reciprocal benefits must be excluded. The corresponding internal regulations in this instance must be observed, as well. Donations made to UKB are always used for the intended purposes. As a matter of fact, our employees cannot be the direct beneficiaries of donations.

Remuneration for provided services

When remunerating and billing for medical services, the legal and professional regulations must always be complied with. Transparent and correct documentation is imperative. Private medical services must be provided and billed in compliance with personal performance obligations.

As a non-commercial institution under public law, UKB is more oriented towards economic efficiency rather than profit. The billing of services that are not remunerated according to statutory regulations is always based on sustainable and fairly negotiated prices.

Research and teaching

At UKB, we see research and teaching as a core activity, closely linked to patient care. Being a nationally and internationally active and cooperationoriented research institution, we always observe all legal and ethical standards of good scientific practice. Any scientific misconduct will not be tolerated.



Academic teaching is one of the core activities of University Hospital Bonn.



When considering a research project funded by a third party, the only choice criterion should be the pursued scientific scope. Particular attention must be paid to the balance of performance and remuneration in order to ensure the independence of the conducted research.

The University Hospital Bonn and the Medical Faculty together form a nationally and internationally active, cooperation-oriented research institution.

Our project coordinators and their research teams always act transparently and in accordance with the regulation framework of both UKB's research contracts and internal procedures.

4. Handling with UKB's property

Employees must protect UKB's property in particular against loss, damage and theft. Under the term of "property" not only tangible assets, such as consumables, but also intangible assets, such as intellectual property and company data must be understood.

The hospital's property can only be used for the intended work-related purposes. Using UKB's property for personal purposes is not permitted.

5. Social responsibility

At UKB, being responsible also means having a sparing attitude towards common resources and an efficient use of public funds. The property of third parties must always be handled respectfully.



The operating of the University Hospital Bonn is based on public interest, the principles of economic efficiency, and environmental compatibility.

We are committed to ecologically and socially responsible corporate governance and strive to optimize all our daily operations with sustainability in mind. We comply with all applicable laws and regulations, for example, what operator's responsibility, waste management, and construction projects at our site are concerned.

We comply with the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz - LkSG) and with the underlying international human rights and environmental agreements. Moreover, we developed an appropriate living system for monitoring the adherence to the corresponding direct and indirect obligations. International agreements in this regard include the United Nations' Universal Declaration of Human Rights, the United Nations' Guiding Principles on Business and Human Rights, the International Labor Standards of the International Labor Organization, and the United Nations' Global Compact.

As a hospital, we are also aware of our responsibility with regard to medical secrecy and patients' data. We put particular focus on protecting all types of personal data, including the data of our employees and suppliers. The professional approach of our IT department and constant controls on the behalf of our Information Security Officer and Data Protection Officer enable a safe and secure data handling at UKB.

Personal data is only processed in a lawful manner that is comprehensible to the data subject. Furthermore, we handle data sparingly and delete or block it as soon as it is no longer required. By implementing technical and organizational measures we ensure that no data can be lost or inadvertently disclosed.

As a provider of critical services, we have specific legal obligations with regard to the hospital's information security. We meet this responsibility through a specially designed risk management system, external audits, and a continuous improvement process.

Information referring to UKB's internal affairs or business partners, suppliers, service providers, funding organizations, and health insurances are treated confidentially and are protected against loss and unauthorized access. Confidential information is not to be disclosed either intentionally or unintentionally. Our employees are regularly and adequately trained on this subject and on the importance of personal responsibility in this regard.

We also protect the health of our employees by ensuring workplace safety. In order to do so, we implement high health and safety standards and offer our employees a wide range of health benefits.

6. Code of Conduct implementation and violations reporting

UKB expects every member of the Executive Board, every manager and every employee to act in accordance with the present Code of Conduct.

The manager of each department can be contacted in case of questions regarding the practical application of the Code of Conduct. For compliance-related questions, the designated Compliance Office can be contacted, as well.

Violations of behavioral requirements and legal provisions, as well as of internal guidelines and regulations, can have serious consequences not only for the directly affected subject, but also for UKB. Therefore, no misconduct will be tolerated. UKB undertakes disciplinary measures against misconduct and violation instances within the framework of legal regulations and without making exceptions, i.e., without taking into account the rank or the position of the subject.

Instances of serious misconduct must be reported in order to allow UKB to readily intervene and adopt the right measures, aimed at preventing similar incidents in the future. Following the EU Whistleblower Directive and the German Whistleblower Protection Act ("Hinweisgeberschutzgesetz"), UKB has set up an internal reporting channel at the Internal Audit & Compliace Department (accessible to the public) and a whistleblower portal (only for employees).

If an employee becomes aware of a violation of the Code of Conduct, the respective manager should be informed first. In most of the cases, a quick and sustainable solution can be found in this way. Of course, the Compliance Office can also be contacted.

Compliance Office contact:

Internal Audit & Compliance Department

Building A01 Venusberg-Campus 1, 53127 Bonn

Contact:Andreas Heiden, Head of Department and Compliance OfficerTel.0228 – 287-13563E-Mailandreas.heiden@ukbonn.de

Martina Köster, Deputy Head of DepartmentTel.0228 - 287-13562E-Mailmartina.koester@ukbonn.de

Alternatively, employees can use UKB's internal whistleblower portal.

Whistleblower portal:

http://www.ukb.intern/C125696000418A5A/direct/internal-reportingfunctionwhistleblower-portal

The received information should enable the University Hospital Bonn to promptly react to violations and to prevent similar issues in the future. All information will be taken seriously and treated confidentially. The whistleblower will not be subjected to any sanction unless they have violated the law. The report must be made according to the criteria of best knowledge and belief. However, anyone who knowingly makes false accusations or unjustified allegations could face legal consequences.

Transparent, honest and law compliant: through our exemplary conduct we create trust and make a sustainable contribution to the success of UKB.

*Note to readers: the present document is a translation from German. In case of doubt, the original German text of the Code of Conduct is to be referred to.