



Code of Conduct

Business and Corporate Policies

RESPECT | RESPONSIBILITY | TOLERANCE | COOPERATION | SUSTAINABILITY
RESPONSIBILITY | TOLERANCE | COOPERATION | SUSTAINABILITY | RESPECT
TOLERANCE | COOPERATION | SUSTAINABILITY | RESPECT | RESPONSIBILITY
COOPERATION | SUSTAINABILITY | RESPECT | RESPONSIBILITY | TOLERANCE
SUSTAINABILITY | RESPECT | RESPONSIBILITY | TOLERANCE | COOPERATION

Andreas Fahl Medizintechnik-Vertrieb GmbH

"We are a reliable partner for the rehabilitation of laryngectomised, tracheotomised and outpatient ventilated patients."

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Introduction



For over 30 years, Andreas Fahl Medizintechnik-Vertrieb GmbH has been a trusted partner for patients, medical professionals, care facilities, clinics and specialist retailers. The nationwide supply of the approximately 4,000 medical devices is organised centrally from Cologne. Through the branch office in Berlin (since 2002) and regional offices in Austria (2003) as well as in Switzerland (2019), contact with affected persons has been intensified.

Whether nationally or across borders - a total of well over 150,000 patients in more than 80 countries have been cared for according to their needs over the past decades. Then as today, customers appreciate the way we treat them as equals and the reliability of service.

What started as a small office in 1992 has now established itself as a medical aid specialist in the fields of laryngectomy, tracheostomy and ventilation and as an international role model.

The company owes this success to its reliable product quality, service orientation, a network of trustworthy partners and, above all, its highly qualified and dedicated employees. Worldwide, a total of more than 270 employees (status 2023) do their best every day to ensure seamless all-round care.

Together we are successful!


Your Andreas Fahl
Managing Director

Scope

We are a firmly established player in the market of medical device manufacturers and suppliers. Medical technology is indispensable for people's healthcare. Not least for this reason, it is under particular scrutiny by the authorities and is highly regulated.

Every employee at Andreas Fahl Medizintechnik-Vertrieb GmbH is therefore required to ensure that all laws and regulations are complied with in their daily work. And all our partners are also required to comply. This explicitly includes customers, suppliers and business partners. This Code of Conduct supports daily work and serves as a guideline. It should be regarded as a compass to guide all activities at all organisational levels.

If there are differences in the requirements of this Code of Conduct and other laws and regulations, the stricter requirements shall take precedence.

Our Values

We are an owner-managed company with a long tradition and are particularly proud of the quality of our products and our service. The well-being of our patients is at the centre of everything we do. To do this, it is essential that we can be guided by our values.

Our philosophy is to develop high-quality medical technology solutions that improve people's lives and drive the healthcare industry forward. Our work is based on the following core values:

- 1. Innovation and Quality**
- 2. Customer Focus**
- 3. Integrity and Ethics**
- 4. Responsibility and Sustainability**
- 5. Communication and Cooperation**
- 6. Decision-making Processes**
- 7. Feedback and Conflict Solving**
- 8. Confidentiality and Data Safety**

1. Innovation and Quality

- 1.1** Andreas Fahl Medizintechnik-Vertrieb GmbH is a manufacturer within the meaning of the EC Medical Device Directive [Directive 93/42/EEC | MDD] and a manufacturer, distributor and importer in accordance with the EU Medical Device Regulation [EU Regulation 2017/745 | MDR].
- 1.2** The success of our company is based on our high product and service quality, i.e.
- an extensive, high-quality and innovative product range
 - good delivery capability
 - friendly and competent advice and flexible customer service
 - our innovative ideas and the ability to implement them quickly in collaboration with our stakeholders.

We endeavour to constantly look for innovative solutions to improve healthcare and set new standards.

- 1.3** We uphold high quality standards in development, production and customer service. As a manufacturer and trading company, the name "Andreas Fahl" also stands for a competent partner in specialist circles. To guarantee consistent quality, our quality management system has been certified by an independent certification body since 1998. In accordance with DIN EN ISO 13485 and Annex II as well as Annex V of the European Medical Device Directive 93/42/EEC, we are regularly inspected and certified by an independent body in line with clearly defined and generally binding standards. The implementation of the new EU Medical Device Regulation (EU) 2017/745 (MDR) has been completed and also been audited by an independent body. This ensures conformity with applicable requirements.

2. Customer Focus

- 2.1** We serve four different customer groups: end customers/patients, dealers, clinics as well as cost payers/contract partners. When dealing with these different groups, respectful cooperation on an equal footing is at the centre of our interest.
- 2.2** We listen carefully to feedback from our customers and use it to continuously improve our products and services.
- 2.3** As a foundation and to secure our future business base, we maintain extensive contractual partnerships with health insurance companies and international distribution partners. In this regard, we are committed to the Medical Devices Code 2023 of the German Medical Technology Association.

<https://www.bvmed.de/de/recht/healthcare-compliance>



3. Integrity and Ethics

- 3.1** We always act with integrity and in accordance with the highest ethical standards. Our actions are governed by trust and transparency.
- 3.2** We are committed to creating an environment in which everyone is respected and valued regardless of gender, age, colour, origin, religion, sexual orientation or other characteristics. Our actions are oriented to ensure that everyone at Andreas Fahl Medizintechnik-Vertrieb GmbH is free from discrimination, harassment or mobbing. We do not tolerate any form of discrimination, intolerance or disadvantage. Information or questions can be sent confidentially and also anonymously to Compliance Management at compliance@fahl.de.
- 3.3** We reject all forms of corruption such as bribery, corruptibility and extortion and are committed to integrity in all our business relationships. Illegal or inappropriate behaviour will result in civil or criminal proceedings for every employee, business partner and all interested parties of Andreas Fahl Medizintechnik-Vertrieb GmbH.
- 3.4** We respect internationally recognised human rights and environmental obligations and take due care to prevent human rights violations and environmental pollution in the course of our business activities.
- 3.5** In particular, we condemn all forms of child and forced labour, all forms of slavery and (modern) human trafficking.
- 3.6** Furthermore, we are committed to complying with the occupational health and safety regulations applicable at the respective place of employment, paying appropriate remuneration and protecting the freedom of association of our employees.

As part of risk management, we conduct annual and ad hoc risk analyses to identify human rights and environmental risks across our supply chain, paying particular attention to those risks that are prevalent based on our experience in the medical device sector. If, as part of our risk analysis, we determine that a violation of a human rights-related or environmental obligation has already occurred or is imminent, we will immediately take appropriate remedial action. The principles outlined here apply both to our own business area, i.e. to all our employees, as well as to our suppliers in the supply chain.

- 3.7** We expect our suppliers and business partners to also commit to complying with our principles and to develop and embed appropriate and effective processes to address and prevent the risks and violations we have identified and also to identify further potential risks. To communicate our expectations transparently to our suppliers and business partners, we have developed a Supplier Code of Conduct, which forms part of all supplier contracts.

4. Responsibility and Sustainability

- 4.1 We think ahead and act responsibly to ensure occupational safety. All employees and partners are required to report any violations or deviations to the Occupational Safety Officer or via the compliance reporting system compliance@fahl.de.
- 4.2 We are aware of our responsibility towards society and the environment and endeavour to promote sustainable practices in our work.
- 4.3 We are actively committed to social and environmental responsibility and contribute to bringing about positive changes in our community.



5. Communication and Cooperation

- 5.1** We communicate openly and respectfully with each other and promote a culture of respectful dialogue, be it in direct conversation, on the phone or in correspondence.
- 5.2** We listen actively, value the diversity of ideas and opinions of our colleagues and partners and contribute constructively to finding solutions.

6. Decision-making Processes

- 6.1** We think, work and act in a solution-orientated manner and are open to suggestions. In this process, we take into account various aspects, whereby these can also be contributed through joint cooperation.
- 6.2** We actively participate in discussions and decision-making processes and accept majority decisions.
- 6.3** In meetings, we respect the agreed agenda and timetables. We arrive on time, prepare ourselves appropriately and document the results in minutes.

7. Feedback and Conflict Solving

- 7.1** As an organisation, we wish to grow and improve. We therefore give and receive feedback in a constructive and consistent manner. We value critical feedback as an opportunity for improvement.
- 7.2** Ideas, improvements or reports can be sent in writing by e-mail to compliance@fahl.de or posted anonymously in the "feedback boxes" provided for this purpose. An appropriate reporting form is available to make reporting easy.
- 7.3** We resolve conflicts in a constructive and respectful manner. We utilise communication as a tool for resolving differences of opinion.



8. Confidentiality and Data Safety

- 8.1** To be able to provide our range of products and services to patients, Andreas Fahl Medizintechnik-Vertrieb GmbH must collect, store and process patient data. We treat this highly confidential, personal social data with great care and sensitivity. All employees who come into contact with these data are under a special obligation to maintain confidentiality.
- 8.2** We have established a data protection management system (DPMS) to honour our special responsibility in this respect. This ensures that confidential data and information are protected adequately.
- 8.3** Information and violations should be directed to the Compliance Officer or to compliance@fahl.de.

Information will be treated with absolute confidentiality in accordance with the Whistleblower Protection Act. We do not tolerate any discrimination or reprisals against whistleblowers.

Information can be given to any supervisor or personally to the Compliance Officer Thomas Schwerdt: compliance@fahl.de.

Compliance with this Code of Conduct is binding for all employees of Andreas Fahl Medizintechnik-Vertrieb GmbH. Non-compliance with the Code of Conduct has a negative impact on the business relationships and reputation of Andreas Fahl Medizintechnik-Vertrieb GmbH. We believe that implementing these principles will help us to accomplish our mission and strengthen our position as a responsible and innovative company in the medical technology industry.

"We are a reliable partner for the rehabilitation of laryngectomised, tracheotomised and outpatient ventilated patients."

Andreas Fahl, Managing Director

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