



# aap Implantate AG

## Code of Conduct

# Table of Contents

1) Foreword by the Management Board.....	03
2) Our Values.....	04
3) Our Business Principles.....	07
4) Respecting the Code of Conduct.....	11
5) Noncompliance and Reporting.....	12
6) Closing Words by the Management Board.....	14

# Foreword by the Management Board

Our everyday actions make us who we are – and continually shape who we will become – as a business, a brand and a global example of kinder, wiser industry practices. For this reason, it is essential that we share not only our core values, but also a common code through which we can clearly understand and act on those values.

This Code of Conduct is more than a book of rules. Rather, it is a living text that documents our respect for the impact of individual actions on our own lives and on the lives of our colleagues, customers, partners and the communities we all share. It is a vital contract to which we hold each other and ourselves. No matter how complex a single moral or ethical question may be, the answer – and the intent of this code – is straightforward: do what is right.

Be honest, welcoming, respectful and lawful. Be an up-stander and an advocate. As individuals, we innately understand and honor these values. As a global organization, we recognize the need to set down basic standards for embodying them in our day-to-day experiences at aap. Our Code of Conduct shows us this vision. It is up to each of us, each day, to make it a reality. We have no doubt that we will.

Our behavior is our success. We look forward to continuing to share our values and our success with you for the years to come.

Your Management Board

A handwritten signature in blue ink, appearing to be 'R. Di Girolamo', written in a cursive style.

Rubino Di Girolamo  
Chairman of the Management Board / CEO

A handwritten signature in blue ink, appearing to be 'A. Mierzejewska', written in a cursive style.

Agnieszka Mierzejewska  
Member of the Management Board / COO

# Our Values

Our core values were not handed down or made up by a small, select group of leaders or experts. Each has been at the heart of the way we do business for generations. More than any name, logo or story, our values describe who we are as a company of like-minded individuals. We all work from the same foundation and toward the same vision.

## **Beliefs Become Behaviors**

Our Code of Conduct guides us in our actions to embody our five core values. When we act from our values, we act for ourselves, for each other, for our industry, for our earth, and for the shared success of all.

# Our Values

1

## Patient Focus

The patient is the focal point of what we do. Our aim is to maintain or improve the patient's mobility and to secure with our products a pivotal part of her or his quality of life. We want to make a fundamental contribution toward improving the health and wellbeing of people all over the world.

2

## Innovation

Innovation is the motor of progress and a central element of our corporate strategy. We develop innovative platform technologies and products in response to unmet needs and challenges in traumatology. Innovations are the basis of our dynamic growth and ensure our company's long-term success.

# Our Values

3

## Employees

Our employees are the bedrock of our entrepreneurial success. We respect our employees and their values and cultures both outwardly and internally and do not tolerate discrimination of any kind. Targeted encouragement and in-service training of our employees are for us fundamental aspects of our corporate governance.

4

## Value Creation

With our innovative platform technologies and products we focus on unmet needs and challenges in traumatology. We thereby create genuine and sustainable added value for patients and physicians and thus also for our shareholders.

5

## Sense of Responsibility

We stand for conscious and sustainable management of the environment and its resources. As a reliable member of society we always act responsibly. We respect ethical standards and abide by them. We stand for equality of opportunity in competition and respect international and national laws.

# Our Business Principles

The following are some examples showing how our basic principles translate into specific expectations and applications in the course of everyday business. These principles help us to visualize our values in action, and give us a deeper, real-world understanding of the standards to which all **aap** employees are trusted to hold themselves and each other.

# Our Business Principles

## Integrity

Integrity means acting out of and in accordance with our basic principles: doing as we say, and saying as we do. We act honestly, responsibly and lawfully in all matters of business. We respect the universal rules of competition. We uphold our own names and reputations as well as those of our company – aap.

### **Honesty**

We are truthful and trustworthy in all we say, write and do. We are forthcoming with our knowledge and feedback. We remain respectful and thoughtful of all those with whom we do business.

### **Responsibility**

We understand our duties and are committed to performing them to the best of our abilities. We are accountable for our actions and decisions, and we hold others accountable in turn.

### **Legal Compliance**

We understand, respect and comply with all local, national and international laws and regulations. These govern our business and the places in which we do business. We recognize that having knowledge of unlawful activity and not reporting it appropriately makes us complicit and culpable legally, morally and ethically.

### **Gifts and Favors**

We understand that even gifts or favors given with purely good intentions may be inappropriate in context. We are sensitive to these complexities. We do not give or accept gifts, favors or hospitality, in any form, when the giver may – or may appear to – expect something in return.

### **Conflicts of Interest**

We understand that personal and professional conflicts may arise in the course of doing business. For example, when an employee's interpersonal relationships interfere with their ability to lead fairly and objectively, or when an employee also works for other organizations. We are responsible for identifying, avoiding and reporting these conflicts or potential conflicts appropriately.



# Our Business Principles

## Respect for People and Nature

We respect our fellow humans and the resources we all share. This means placing the highest values on our universal rights to dignity, equality and safety, and our universal need for a healthy environment.

### Human Rights

We honor and uphold the United Nations' Universal Declaration of Human Rights ([www.un.org/en/documents/udhr/](http://www.un.org/en/documents/udhr/)), respecting that all people, regardless of race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status, are entitled to the same, inalienable rights as equal members of our human family.

### Health and Safety

We have the right to a healthy, safe and secure workplace. We will do our part to preserve and promote an environment in which we can all thrive. We are committed to knowing and complying with all current health and safety regulations and emergency plans. These measures will depend upon the unique circumstances of each location.

### Harassment and Violence

We know that intolerance, intimidation and violence have no place at **aap**. We are all entitled to feel safe and respected at work. We are unified in our zero-tolerance approach to sexual harassment, intimidation / extortion, aggression and discrimination. We recognize that gossiping, bullying and teasing are harmful, and we choose to speak out rather than join in.

### Alcohol and Drugs

We understand that smoking, alcohol and drugs can negatively affect our health, the health of those around us, and our ability to do our jobs well. While at work, we use such substances responsibly or not at all. If we smoke, we do so only in designated areas. If we drink alcohol, we do so with the express approval and oversight of leadership, such as when it is served during authorized company events. In such instances, we exercise moderation and good judgment.

### Sustainability

We care about the health of our earth and are committed to working sustainably. We strive to understand, measure and improve the ecological impacts of our company's products, processes and practices. Dedication to sustainability also impacts our individual choices. We will work together to systematically reduce the negative environmental effects of doing business.

# Our Business Principles

## Confidentiality

Transparency is essential to our business philosophy, as is earning and keeping the confidence of our colleagues, customers and partners. Doing both well means respecting the difference between information that is open, public or publishable, and information that is private, proprietary or protected. We treat all information, knowledge and intellectual property with care.

### Intellectual Property Rights (IPR)

We recognize that, in our industry, IPR such as patents and trademarks are vital assets that differentiate competitors from each other. We will protect aap's IPR to the best of our abilities. We also fully respect the IPR of others.

### Social Sharing

We understand that we are free to share personal information, photographs, videos and other content via our personal social media accounts. We also understand that how we use such media can have positive and / or negative effects on our work, professional reputations, professional success, and that of aap. We make clear distinctions between what constitutes personal and professional use of social media. We uphold the very simple rule at the basis of aap's social media policy: If it's inappropriate in normal social life, it's probably inappropriate on social media too.

### Nondisclosure

We value the trust placed in us by aap as an employer, service provider and business partner, and respect the role of nondisclosure in earning and keeping that trust. We understand that "confidential information" means any information that is not currently public, such as strategic plans, sales figures, financial information, information regarding negotiations, agreements or dealings between aap and others, human resources information, trade secrets, patents, trademarks, and similar information from customers or partners. We protect such information, regardless of whether it belongs to aap, our customers or partners, or previous employers. We will share it only if we are legally required or authorized by aap to do so. We are responsible, when storing or transmitting confidential information, to prevent it from being obtained by unauthorized parties.

# Respecting the Code of Conduct

## Be Empowered

In order to bring value to **aap**, this Code of Conduct must first have value to you. Every **aap** employee will receive a copy of our Code of Conduct. Read it. Understand it. Accept and apply it as your own, because it is. Our Code of Conduct is based on what matters to all of us. It is created explicitly to aid us in treating each other and our company name with the same respect we desire and deserve for ourselves.

As a living document, our Code of Conduct also compels us to maintain an open and cooperative environment in which we feel empowered to ask questions, raise concerns and resolve dilemmas concerning its interpretation and application.

Those of us who have earned responsibilities over and above our peers – members of the Management Board, Directors, Managers and other Supervisors – are duly obliged to uphold the Code of Conduct and to lead by example in all matters of compliance. However, each of us, at every level, is expected to always do our best to do what is right. That includes preventing, questioning and reporting what we believe to be wrong.

# Noncompliance and Reporting

## Do Right, No Exceptions

Noncompliance means, simply, failing to do what is right. Acts of noncompliance can be clear and undisputable, or subject to interpretation and further investigation. We trust you, our employees, and expect you to act with good intentions. This trust, as well as our Code of Conduct and our company's commitment to settling matters fairly, fully and firmly, guides every aspect of our approach to noncompliance, reporting and resolution.

### Noncompliance

We understand that failing to uphold our Code of Conduct, whether intentionally or through ignorance or negligence, can have swift and serious consequences for all involved – including aap. We respect our company's commitment to treat all matters of noncompliance and suspected noncompliance fairly, fully and firmly. We understand that some matters may be subject to consequences above and beyond those imposed by aap. We recognize that using a third party or other means to bypass this Code of Conduct is prohibited. We further understand that violations of this Code of Conduct may lead to disciplinary measures, including dismissal.

### Reporting an Incident

We recognize that silence and apathy can do far more damage than timely, thoughtful reporting. We are committed to communicating known and suspected acts of noncompliance so that they can get resolved quickly and correctly. As such, we will respect the Reporting Procedure as outlined by aap and abide by it. We understand that failing to do so is, in itself, a violation of our Code of Conduct and may be treated as such.

# Noncompliance and Reporting

## Our Reporting Procedures

For the comfort, confidence and convenience of our employees, aap uses a two-channel reporting system.

1

### First Channel:

Speak to your **direct supervisor, department head or confidential adviser (Manager Human Resources)**. She / he will be able to provide further clarification of corporate policies, offer advice, and help resolve the issue. In any case this person will enter the alleged irregularity in aap's **protected electronic whistleblowing system** in order to ensure an effective processing. Please also see aap's Whistleblower Policy in this context.

2

### Second Channel:

If you want to avoid a direct conversation or if you want to remain anonymous, you can directly report any alleged irregularity via aap's **protected electronic whistleblowing system**. You can reach it via the following link: <https://aap-implantate.integrityline.org>. Please also see aap's Whistleblower Policy in this context.

### Non-Retaliation:

aap protects its employees from any retaliation arising as a result of reporting known or alleged irregularity. Provided you have acted in good faith and are not culpable for the reported act, you will experience no negative consequences for reporting it through the appropriate channels. aap further recognizes and respects the need for confidentiality and nondisclosure regarding the content of a report and any information leading to the report or related to its investigation and resolution.

# Closing Words by the Management Board

We do not believe in creating rules for every instance and interaction. Rather, we are confident that aap and all our employees can continue to succeed on the basis of our shared values.

Therefore, we hereby commit to you our own promise to uphold this Code of Conduct, the values on which it is founded, and the everyday standards of good business and good behavior that it commends. We trust you will make the same promise to us and to all of your colleagues.

**Remember that however complex the question, the answer is simple: do what is right.**

Your Management Board

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Rubino Di Girolamo  
Chairman of the Management Board / CEO

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Agnieszka Mierzejewska  
Member of the Management Board / COO

## Closing Words by the Management Board

aap will do right by you.

Our behavior is our success.



## aap Implantate AG

Lorenzweg 5 • 12099 Berlin • Germany

Phone 030 75019-0 • [info@aap.de](mailto:info@aap.de)

[www.aap.de](http://www.aap.de)