



  
BIOMEDICA

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# CODE OF CONDUCT BIOMEDICA GRUPPE

**I**n 2023, Biomedica celebrates its 45<sup>th</sup> anniversary. As an internationally active company with a long tradition, the Biomedica Gruppe enjoys a high reputation among its customers, business partners, and employees.

Therefore, it is extremely important that our daily business follows a flawless legal and rule-complying behavior.

With this code of conduct, we are committing ourselves to the following expectations and to our responsibility towards our corporate environment and our employees. This Code of Conduct applies to all sites and for all companies, which are part of the Biomedica Gruppe.

The principles and guidelines summarized in this code are binding for the management, all executives, and all employees of the Biomedica Gruppe and serve as the basis for our day-to-day business activities.

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## 1. Compliance with Laws and Regulations

At all locations of the Biomedica Gruppe, the applicable legal regulations must be adhered to. The management, executives and employees of the Biomedica Gruppe are only acting in the interests of the company if they observe the laws, even if this may seem strategically and economically inappropriate. Each individual employee is responsible for ensuring that his or her behavior always complies with these laws and regulations. We expect all executives to exemplify this behavior appropriately and to act as contact persons for any questions.

Our ISO 37001 (Anti-Bribery Management Systems) certification demonstrates our commitment to preventing, detecting and combating corruption. All employees and business partners are obliged to comply with our anti-bribery policy.

Compliance with the Medical Devices Act and its most current amendments, together with the relevant national and community regulations and directives, has a great significance for the fulfillment of our business activities.

## 2. Responsibility for the Reputation of the Company

The reputation of the Biomedica Gruppe is significantly shaped by the appearance, actions and behavior of each individual member in the company. Illegal or inappropriate behavior made by even one employee can cause considerable damage to the company.

Each employee is therefore held to uphold and promote the reputation of the Biomedica Gruppe in their particular country.

## 3. Confidentiality of Information

The importance and duty of maintaining secrecy relates in particular to intellectual property. This includes not only trade secrets, patents, trademarks and copyrights, but also business and marketing plans, designs, business papers, salary data, and any other unpublished financial data and reports.

Information concerning the Biomedica Gruppe and its business partners will be treated confidentially and may not be disclosed to third parties, unless this information has been previously published in a permissible manner. Excluded from this are situations where the government requests the disclosure of information, events where reporting is obligated, as well as in the context of the fulfillment of operational matters.

The direct or indirect use of confidential information for personal purposes is prohibited. It is the management's duty to ensure that such information is protected against unauthorized access.

#### **4. Data Protection**

All companies of the Biomedica Gruppe have implemented the currently valid data protection regulations. The personal data of customers, employees and other business partners are covered by these data protection regulations and will only be processed or used in the Biomedica Gruppe if this is legally permissible to do so, or if the person affected agrees.

Personal data may only be collected for specified, explicit and legitimate purposes and may not be further processed in a manner incompatible with said purposes. In any event, data collected in a legitimate interest will only be stored for as long as it is necessary for the purposes for which it has been determined. Particular attention must be paid to the storage and deletion of sensitive data, such as patient information that may be generated in the course of doing business.

All personal information is to be processed in a manner that ensures adequate security. Appropriate technical and organizational measures ensure that unauthorized persons have no access to the data or the devices with which they are being processed. Responsible handling of personal and above all sensitive data, was and will be communicated to all employees in appropriate training courses.

The responsible data protection officer supports the individual departments in the headquarters and the trained representatives in the subsidiaries.

All employees of the Biomedica Gruppe have given their consent to the processing of their personal data.

#### **5. Cooperation with Business Partners and Third Parties**

##### **a. Choice of Suppliers**

Business partners are selected according to purely factual and economic criteria; suppliers are audited fairly and unbiasedly. Biomedica expects their suppliers to respect the values reflected in this Code of Conduct and to adhere to them in their collaboration with Biomedica.

In particular, Biomedica pays attention to only support products,

- that have not been created with child labor,
- that are in compliance with international environmental standards,
- and that respect the safety and health of the employees who have manufactured them.

### **b. Prohibition of Corruption**

Responsible persons and employees of the Biomedica Gruppe are required to keep accurate and transparent records that reflect the actual payments and transactions of the business processes in the company.

Incorrect, misleading or incomplete entries in business documents and reports are prohibited.

Transactions that require partially or wholly false or fictitious disclosures are not permitted.

Without accompanying documentation, no payments may be authorized or made. In no situation may secret or covert funds or assets be established or maintained. Internal accounting controls must ensure that no payments have been made for the purpose or understanding, in whole or in part, for anything other than that which has been described in the documentation.

### **c. Bribery / Gifts and Hospitality**

The Biomedica Gruppe resolutely rejects any kind of bribery and does not tolerate any forms of corruption. We only want to receive orders fairly, with high-quality products and customer-specific services. All employees, regardless of their position in the company, are prohibited from offering, promising, or granting benefits to counterparties, their employees or agents, officers, politicians, or members of any of the named groups in return for preferential treatment.

Decisions of public officials, not just civil servants, but anyone entrusted with public functions, must not be influenced by cash payments or other gifts. The term „public official“ includes the representatives or employees of public authorities or other public bodies (eg hospitals), agencies or legal entities, as well as the officials or employees of state enterprises and public organizations. This term also includes candidates for political office, official representatives, and staff of a political party as well as political parties themselves.

### **d. Corruptibility/ Acceptance of Gifts**

All employees are prohibited from directly or indirectly soliciting or receiving gifts and gratuities in



connection with business activities. This does not apply to occasional invitations and gifts that are of insignificant financial value and that conform to the usual business practices. However, the prerequisite for the acceptance of such invitations and gifts is always that no laws have been violated and any influence on a business decision must be ruled out from the outset.

## 6. Fair Competition

The Biomedica Gruppe is committed to ensuring fair performance competition. An essential requirement for impartial and fair competition is therefore that all cases of misleading and aggressive business practices be rejected, and therefore prevented. All employees of the Biomedica Gruppe are additionally under the obligation not to accept or create any unfair advantage through manipulation, concealment, misuse of confidential information and data or through wrong or misleading interpretation of essential facts.

## 7. Personnel Policy

### a. Fair and Safe Working Conditions

As a responsible employer, the Biomedica Gruppe considers its employees a great value. Biomedica demands great dedication from its staff and, in return, shares the business' success with them.

The personnel policy helps to offer each employee the possibility of professional and personal development. The open exchange of views, criticism and ideas are encouraged.

Biomedica's responsibility to its employees also means that the Biomedica Gruppe has secure working conditions in all its branches, which complies with all relevant and local legal requirements.

### b. Tolerance and Equal Opportunities

As a global trading company with 12 branches in Central and Eastern Europe, a team of more than 280 employees, and global business partners, Biomedica works with people of different nationalities, cultures, religions and beliefs. Interactions at Biomedica are to be characterized by fairness, openness, and mutual appreciation; discrimination, disparagement or other belittling will not be tolerated.

The biggest strengths of the Biomedica Gruppe include highly qualified, committed, and diverse employees. All employees must always treat each other with mutual respect and dignity.

Gender, age, skin color, origin, religion, ideology, political views and sexual identity should not play a role here. Biomedica does not tolerate verbal or physical harassment or intimidation.

### **c. Conflicts of Interest**

Members of management, executives and employees should not be involved in conflicts of interest or loyalty to the company within their professional activities. No agreements may be made that conflict with one's responsibility to the Biomedica Gruppe.

Examples of such conflicts of interest are:

- Business with family members
- Direct or indirect investments or employment relationships with other companies
- Personal benefits from business relationships with competitors or business partners

Actual or potential conflicts of interest must be reported to the company management and must be discussed. If such activity is approved, it must be documented.

Internal conflicts of interest can arise when a family member, a member of your home community or another person close to you works in your department or leadership. Such relationships must be disclosed to the supervisor.

This information will be used to decide if there is a conflict.

A temporal conflict of interest can occur when employees pursue a second job or run their own business.

### **d. Dealing with Assets**

Biomedica Gruppe provides its employees with equipment and protective measures, which help to ensure the safety and efficiency of both the employer's work and the workplace itself. These facilities, items and equipment must be handled with utmost care and be adequately protected against theft and misuse.

Special precautions must be taken when using modern means of communication such as mobile devices, electronic media, the internet and the mailing systems.

## **8. Responsibility and Monitoring**

The rules contained in this Code of Conduct form a core element of the corporate culture at the Biomedica Gruppe. Consistent adherence to these principles is indispensable. Every employee is responsible for this. If an employee has concerns or complaints about the issues listed in this Code of Conduct or has knowledge of any breaches of the Code of Conduct contained here, the employee should promptly submit this to the supervisor for clarification. This can also be done anonymously or in a confidential manner. If

an employee is not satisfied with the explanation, he or she may discuss the request or the complaint not only with his or her supervisor, but also with the member of the management team responsible for human resources (MMT). The employee should have no fear of reprisals due to complaints, that have been made in good faith. The management and all employees are bound by the rules of this Code of Conduct. Violations of this Code will lead to consequences. In serious cases, this may lead to a termination of the employment relationship.

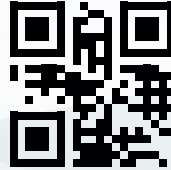
## **9. Global and European Laws and Guidelines**

In addition to the laws and regulations of each country, there are a number of important agreements and recommendations from international organizations. As an international company, we also follow these guidelines:

- International Human Rights Charter
- European Convention for the Protection of Human Rights and Fundamental Freedoms
- OECD- Guiding principles for multinational companies
- Agenda 21 on sustainable development (fair trade)
- UN Convention against Corruption
- Code of Conduct of the International Chamber of Commerce (ICC) to combat corruption in business dealings
- EU Directive 2005/29 / EC (unfair competition)
- FCPA (Foreign Corrupt Practices Act)
- Bribery Act
- MedTech Europe – Code of Ethical Business Practice and the local variations of the member organizations such as the Austromed Codex

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