



## Compliance Code of Conduct

for companies and employees of KLS Martin Group



## Foreword by the Management Board

Dear employees,

Culture is the foundation of the KLS Martin Group, because our values of **co-creation, respect and appreciation, personal proximity, reliability, variety and diversity** shape our actions. At any time.



### Co-creation

We create and care together



### Respect and appreciation

We value and respect life



### Personal proximity

We are global and personal



### Reliability

We work focused and reliable: now and in the future



### Variety and diversity

We empower variety

We see it as our mission to develop surgical solutions which inspire users and pay dividends. We provide surgeons with solutions which make the difference. This is owed to the dedication, precision and care which we invest in their development, manufacture and sales which become evident every time they are used. This confers on them a value which is higher than the price they cost. Be it that they offer a unique advantage. Be it that they render their users prolonged outstanding service due to their exceptional high quality, reliability, and availability.

This Code of Conduct provides a guide for our daily actions, helping us to fulfill our mission and ensure the success of the KLS Martin Group today and in the future.

I am counting on your contributions to the observance of our Code of Conduct and thank you for your support.

Sincerely,  
Christian Leibinger,  
Managing Director  
Chairman of the Supervisory Board KLS Martin Group

November 2025

## 1. We adhere to the Compliance Code of Conduct of KLS Martin Group

This Code of Conduct is adhered to by all of us, i.e. employees\* (including trainees, interns and working students), senior executives (including division, department and group managers) as well as the managing directors or managing directors of all companies, subsidiaries or representative offices of the KLS Martin Group, during our activities worldwide.

## 2. We comply with applicable law and internal regulations and the United Nations Global Compact

- 2.1 We comply with the relevant laws and regulations of the countries in which we operate. In addition, we observe all internal company regulations, such as work instructions, works agreements and guidelines.
- 2.2 As a company, we stand up for the ten principles of the United Nations Global Compact. These include, in particular, the observance of human, labor and environmental rights as well as the prevention of all forms of corruption.
- 2.3 All employees in management positions ensure that legal and internal requirements are known and complied within their areas of responsibility.

## 3. We report irregularities and work to eliminate them

- 3.1 If we detect possible violations of legal regulations, internal regulations or this Code of Conduct, we are encouraged to report them to remedy irregularities. To do this, we can inform our supervisor or use the KLS Martin Whistleblower System, which can be accessed via the KLS Martin website (<https://klsmartin.integrityline.app>). The KLS Martin Whistleblower System can also be used by business partners and other whistleblowers.
- 3.2 Any reports will be treated confidentially.

\*All terms used in this code of conduct apply equally to all genders.

## 4. We manufacture sustainable and high-quality products

- 4.1 When developing, manufacturing and distributing our products, we comply with the applicable regulatory regulations and requirements. This applies in particular to the marketing, provision and commissioning of medical devices.
- 4.2 When selecting materials and components, we pay attention to environmental and health compatibility as well as sustainability. In doing so, we ensure that the substances used meet both the applicable regulatory requirements and the principles of ecological and social responsibility. We favor materials with proven conformity and documented origin and promote the use of circular materials wherever technically and economically viable.
- 4.3 To ensure our long-term goals as well as the high-quality and economic production of our products, we use management systems that transparently describe and systematically implement the networking of processes.
- 4.4 If we have any questions or doubts, we will contact the responsible departments of Regulatory Affairs or Corporate Management.

## 5. We are committed to a free, fair and competitive market economy

- 5.1 We comply with antitrust and competition law laws and regulations.
- 5.2 We do not enter into any formal or informal agreements with competitors to align prices or unlawfully divide markets by industry, product, territory or customer.
- 5.3 We do not exchange information with competitors about distribution channels, conditions, prices, costs, offers, margins, individual customers or other competitively relevant issues.
- 5.4 We do not directly or indirectly agree on resale prices with our customers, suppliers and other business partners (e.g. dealers) and do not demand such. We do not participate in boycotts of customers or suppliers.
- 5.5 We do not favor or disadvantage competing customers in any way. When tendering, we comply with the relevant regulations and, in particular, we do not enter into any unlawful agreements with competitors aimed at inducing a customer to accept a particular offer.

- 5.6 In projects, we behave in a cooperative and appropriate manner when dealing with suppliers or other business partners. The selection of a supplier or other business partner should be based exclusively on our financial interests.
- 5.7 If we have any questions or doubts, we will contact the responsible Legal & Compliance department.

## 6. We do not grant or accept any unlawful benefits

- 6.1 We comply with anti-corruption laws and regulations. This is especially true when working with business partners from the healthcare sector (e.g. medical facilities, doctors, nursing staff).
- 6.2 We do not offer or promise any unlawful benefits to our customers, suppliers, competitors or other business partners (e.g. authorities, development partners or dealers) or their employees.
- 6.3 We do not accept or promise any unlawful benefits from customers, suppliers, competitors or other business partners (e.g. authorities, development partners or dealers) or their employees.
- 6.4 We refrain from granting or accepting gifts and invitations that go beyond what is socially acceptable.
- 6.5 We observe the internal requirements and processes for corruption prevention of the respective companies of the KLS Martin Group.
- 6.6 If we have any questions or doubts, we will contact the responsible Legal & Compliance department.

## 7. We behave correctly in the processing of financial transactions

- 7.1 We comply with laws and regulations on proper accounting, accounting, and the prevention of money laundering transactions and terrorist financing.
- 7.2 We carry out business transactions (e.g. preparation of offers, order confirmations, bookings, invoices, credits and direct debits) in an appropriate manner.
- 7.3 We are committed to helping to detect and prevent money laundering activities (e.g. reporting suspicious transactions). If we have to assume that payments are related to terrorist financing, we do not accept or execute such payments.
- 7.4 If we have any questions or doubts, we will contact the responsible Finance or Legal & Compliance department.

## 8. We comply with export and customs regulations

- 8.1 We comply with laws and regulations on foreign trade and customs law.
- 8.2 We adhere to delivery restrictions for certain countries or persons resulting from national law or UN embargo decisions. If legally required, we apply for necessary export licenses from the relevant authorities. We do not use intermediaries to circumvent any restrictions.
- 8.3 We observe the applicable customs regulations when importing and exporting our products.
- 8.4 If we have any questions or doubts, we will contact the responsible Customs & Trade department.

## 9. We respect the confidentiality of information and the protection of corporate property

- 9.1 We comply with laws and regulations on data and information protection as well as the lawful use of artificial intelligence. In addition, we observe the internal information and IT security guidelines of the respective companies of the KLS Martin Group.
- 9.2 We respect the right to the protection of personal information of employees, customers, suppliers and other business partners.
- 9.3 In order to prevent loss, theft or damage to operational resources, we treat the tangible and intangible assets of our companies, including any intellectual property rights and confidential information, with care.
- 9.4 If we have any questions or doubts, we will contact the responsible departments Information Technology, Intellectual Property or our data protection officer.

## 10. We observe the regulations for the protection of labor and human rights as well as health and environmental protection

- 10.1 We comply with laws and regulations for the protection of labor and human rights, occupational safety and health protection, as well as environmental and climate law. This includes, in particular, ensuring compliance with these principles in our supply chain.
- 10.2 We strongly condemn human rights violations of any kind – especially child labor and forced labor – and do not tolerate them under any circumstances.

- 10.3 We have implemented strict principles and processes in the area of "Health, Safety & Environment" in the respective companies of the KLS Martin Group and adhere to these guidelines.
- 10.4 We support the sustainable protection of our environment and comply with the relevant laws and regulations and, where this is economically responsible, go beyond them.
- 10.5 If we have any questions or doubts, we will contact the responsible departments for Health, Safety & Environment and Material Compliance.

## 11. We are committed to equal treatment and diversity

- 11.1 In the respective companies of the KLS Martin Group, employees from a wide variety of nations work together. Regardless of gender, religion or belief, culture or nationality, sexual identity, age or physical or mental impairment, we respect them all and ensure that there is no discrimination. We do not tolerate any kind of harassment or harassment of employees.
- 11.2 We want all employees to feel comfortable with the respective companies of the KLS Martin Group. Therefore, in our daily cooperation we observe the corporate culture values of "co-creation, respect and appreciation, personal proximity, reliability as well as variety and diversity" always.
- 11.3 We contact our supervisor or the relevant departments if there is discrimination or a possible disregard for corporate cultural values.

## 12. We avoid conflicts of interest and apply the four-eyes principle

- 12.1 We avoid situations where personal interests or interests of family members, relatives or friends come into potential conflict with a KLS Martin Group company (e.g. when awarding a contract to a company in which there is personal interest). We contact our supervisor or the responsible departments if there are possible conflicts of interest.
- 12.2 We make sure that at least two employees are involved in business decisions and processes and observe the internal approval and signature guidelines of the respective companies of the KLS Martin Group.

**KLS Martin SE & Co. KG**

**A company of the KLS Martin Group**

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