

Code of Conduct (CoC) for use with business partners

1 General Definitions

Within this Code of Conduct, CoC, NATUS GmbH & Co. KG (NATUS) describes the binding requirements for its business partners.

NATUS is committed to ecologically, economically and socially responsible business management.

We expect the same behavior of all our business partners. We also expect our employees to observe the principles of ecological, social and ethical conduct and to integrate them into our corporate culture.

We strive to continuously optimize our business activities and our products and services in terms of sustainability, and we urge our business partners to contribute to these efforts within the scope of an overall approach.

For future cooperation, the contracting parties agree on the validity of the following regulations for a common Code of Conduct. This agreement shall be deemed the basis for all future deliveries and services. The contracting parties oblige to comply with the principles and requirements of the Code of Conduct. Our business partners will in turn require their business partners to comply with the standards and regulations specified in this document.

A breach of this Code of Conduct may be grounds and cause for NATUS to terminate the business relationship, including all related supply contracts.

2 Requirements for business partners

2.1 Compliance with laws

The business partner shall oblige to comply with the applicable legal and official requirements.

2.2 Social responsibility

2.2.1 Respect for the basic rights of employees

The business partner obliges:

- to promote equal opportunity and equal treatment, regardless of its employees' color, independent of race, nationality, social background, disability, sexual orientation, political or religious beliefs, gender or age
- to respect the personal dignity, privacy and personal rights of each individual and to communicate in a conflict-free way.

2.2.2 Exclusion of forced labor

No form of modern slavery, forced or compulsory labor, human trafficking or anything similar shall be used. All work must be voluntary, and employees must be able to end their work or employment relationship at any time. In addition, no unacceptable treatment of workers is allowed, such as psychological cruelty, sexual and personal harassment.

The business partner obliges:

- not to employ anyone against their will or force them to work
- nor to tolerate any unacceptable treatment of workers, such as psychological cruelty, sexual and personal harassment or discrimination

2.2.3 Prohibition of child labor

Child labor is not allowed in any part of the business. The business partners are called upon to adhere to the recommendation from the ILO conventions on the minimum age for the employment of children.

Accordingly, the age should not be younger than the age at which general compulsory education ends and in any case not younger than 15 years.

2.2.4 Fair compensation

The remuneration paid to workers must comply with all applicable laws on compensation, including, laws on minimum wage or overtime, for example. If the legal minimum wage is not sufficient to cover the cost of living, the business partner is obliged to pay remuneration that covers basic needs. Deductions from wages as punitive measures are not permissible. The basis on which workers are paid is made known to employees on an ongoing basis by means of a payroll statement.

2.2.5 Fair working hours

Working hours must comply with industry standards, or at a minimum with applicable laws.

2.2.6 Freedom of association

The business partner respects the right of workers to freedom of association, to join trade unions, to appeal to labor representation or to membership in works councils in accordance with locally applicable laws. Workers must be able to communicate openly with management without fear of retaliation or harassment.

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2.2.7 Prohibition of discrimination

Discrimination against employees is not permitted in any form. This applies, for example, to discrimination based on gender, race, caste, color, disability, political beliefs, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

2.2.8 Occupational safety and health

The business partner is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures shall be taken against accidents and detrimental health effects that may arise in connection with the activity.

Adequate fire protection, effective emergency plans and regular drills are carried out for this purpose. Health and safety risks are regularly monitored, assessed and reduced.

In addition, employees shall be regularly informed and trained concerning applicable health and safety standards and measures. Employees shall be provided with access to drinking water in sufficient quantities as well as access to clean sanitary facilities.

2.2.9 Whistleblowing protection

We expect our business partners to implement effective whistleblower mechanisms that enable your employees to report grievances, illegal activities or ethically questionable practices within your company safely and anonymously. Clear guidelines should also be in place to ensure that whistleblowers are protected from retaliation. Information on the whistleblower office of NATUS GmbH & Co. KG can be found at www.natus.de.

2.2.10 Handling of conflict minerals

For conflict minerals such as tin, tantalum, tungsten, their ores, and gold, the business partner is obliged to establish processes in accordance with the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Smelters and refineries without adequate audited due diligence processes are to be avoided.

The business partner shall take appropriate measures to avoid the use of raw materials in its products that directly or indirectly finance armed groups that violate human rights.

2.3 Ecological responsibility

2.3.1 General Information

Within the framework of ecological responsibility, the business partner is guided by the management standards of ISO 14001 and ISO 50001.

In addition, the following key issues should be considered and assessed:

- Emissions into the atmosphere
- Effluent discharges
- Contamination of soils
- Consumption of raw materials and natural resources
- Energy consumption/efficiency

- Release of energy (in the form of heat, radiation, light, noise)
- Generation of waste
- Land use/biological diversity

2.3.2 Treatment and discharge of industrial wastewater

Wastewater from operations, manufacturing processes, and sanitary facilities is to be typed, monitored, inspected, and treated as necessary prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

2.3.3 Handling of air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions are to be typed, routinely monitored, verified and treated as necessary, prior to their release. The business partner is also responsible for monitoring its emission control systems and is required to find economic solutions to minimize any emissions.

2.3.4 Handling of waste and hazardous substances

The business partner shall follow a systematic approach to identifying, handling, reducing and responsibly disposing of or recycling solid waste. Chemicals or other materials that present a hazard if released into the environment shall be identified and handled in a manner that ensures safety during handling, transport, storage, use, recycling or reuse and disposal.

2.3.5 Reduction of the consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, are to be reduced or avoided. This occurs either directly at the source or through processes and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, instituting savings, recycling or reusing materials.

2.3.6 Energy consumption/efficiency

Energy consumption is to be monitored and documented. Economic solutions are to be found to improve energy efficiency and minimize energy consumption.

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2.4 Ethical business conduct

2.4.1 Fair competition

The standards of fair business practices, fair advertising and fair competition are to be observed. In addition, applicable antitrust laws are to be applied, which, in particular, prohibit agreements and other activities that influence prices or conditions when dealing with competitors.

2.4.2 Confidentiality / Data protection

The business partner obliges to meet the reasonable expectations of its client, suppliers, customers, consumers and employees concerning the protection of private and business information. The business partner shall observe data protection and information security laws and official regulations when collecting, storing, processing, transmitting and forwarding personal information.

2.4.3 Cyber Security

The business partner shall take appropriate organizational and technical measures in line with the state of the art to ensure the confidentiality, authenticity, integrity, and availability of its technical and data processing systems.

The business partner shall immediately notify us of any identified weaknesses in operational processes, services, or products, as well as any security incidents relevant to us.

The business partner shall impose comparable obligations on its subcontractors and suppliers. The business partner shall provide us with appropriate evidence of compliance with these obligations upon request.

The business partner may only use data from us — including derived or generated data — for its own purposes with our express prior written consent, in particular the business partner may not use such data for the training, fine-tuning, or other improvement or evaluation of AI components, AI systems, AI models, or similar technologies. This prohibition also applies to anonymized or pseudonymized data, unless it is publicly available information.

2.4.4 Intellectual property

Intellectual property rights are to be respected; technology and know-how transfers are to be carried out in such a way that intellectual property rights and customer information are protected.

2.4.5 Integrity, bribery and accepting of advantage

The highest standards of integrity must be applied in all business activities. The business partner shall accept no form of bribery, corruption, extortion and embezzlement and must pursue a zero-tolerance policy in this regard. In particular, the business partner is obliged to comply with the following regulations: U.S. Foreign Corrupt Practices Act, U.K. Bribery Act, OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

Procedures for monitoring and enforcing standards shall be implemented to ensure compliance with anti-corruption laws.

2.4.6 Export control

Within the scope of business activities, the business partner is obliged to comply with the applicable export control laws and to observe export restrictions or prohibitions. If necessary, the business partner must apply for export licences and the business partner is obliged to support the client in applying for such licences.

2.4.7 Sustainable procurement

When providing goods and services, we expect our business partners to adhere to strict environmental, social and economic criteria. This includes a commitment to environmentally friendly production methods, the promotion of fair working conditions and the application of transparent and ethical business practices. Their measures to conserve resources, reduce CO₂ emissions and support fair trade are of great importance to us. Sustainable procurement practices not only help to protect our environment and society, but are also an important factor for long-term cooperation based on trust.

2.4.8 Money laundering and terrorist financing

Our business partners do not directly or indirectly promote money laundering or the financing of terrorism. They undertake to apply suitable measures to combat them and to place appropriate measures in their supply chain.

3 Implementation of the requirements

Our business partners are to identify risks in supply chains and take appropriate measures to avoid risks. In the event of suspected violations and in order to safeguard supply chains having increased risks, the supply chains are to be disclosed. The business partner shall grant NATUS or a commissioned partner the opportunity to conduct an on-site audit to evaluate the processes in terms of compliance with this CoC.

NATUS reserves the right to take appropriate measures against business partners who do not fulfill these requirements, which may ultimately lead to the suspension or termination of the business relationship.

4 Acknowledgment and agreement of the business partner

The business partner obliges to act responsibly and to comply with the stated principles and requirements. Furthermore, the business partner confirms that it shall effectively communicate the contents of this CoC to employees, agents, subcontractors and business partners and assure that all necessary precautions are properly implemented.