

Code of Conduct Vitrex

Herlev 26-02-2020

Vitrex Medical A/S a company incorporated under the laws of Denmark and having its registered seat at Vasekær 6-8, 2730 Herlev, Denmark hereinafter referred to as Vitrex Medical takes notice of below mentioned Code of Conduct

and will confirm this Code by signature on page three.

The Code of Conduct, embodying the company's core values. All employees are expected to accept and observe this Code. In circumstances not covered by the Code, the principles underlying the Code shall apply.

- **Compliance with all applicable laws and regulations**

Vitrex Medical shall always conduct its business in accordance with all applicable (international) treaties, laws, operational regulations and restrictions. Vitrex Medical applies them in accordance with what may reasonably be expected. Vitrex Medical actively pursues a policy of preventing violations of applicable rules and regulations.

- **Conducting business ethically**

Business will be conducted with integrity. Vitrex Medical act in good faith, responsibly, competently carefully, and with respect for the environment and society. There will be no payments, services, gifts or other advantages offered or given to any Vitrex Medical employee or third party which are intended to influence the way in which the Vitrex Medical employee or third party goes about his or her duties. Similarly, Vitrex Medical will not offer or give such payments, services, gifts or other advantages to any supplier which are intended to influence the way in which the supplier goes about his or her duties. There will be no actual or attempted money laundering.

- **Respect for human rights**

Vitrex Medical supports and complies with the United Nations' Universal Declaration of Human Rights. No employee shall suffer harassment, physical or mental punishment or other forms of abuse.

Vitrex Medical upholds the spirit of the Universal Declaration of Human Rights in respecting the rights of its employees, the communities in which Vitrex Medical operates and those with whom we do business. We seek to work only with other suppliers that uphold the same.

- **Antitrust Policy**

Vitrex Medical is fully committed to compliance with the antitrust and competition laws, which is designed to promote free and open competition in the marketplace. The antitrust law regulates i.a. routine business decisions involving prices and price-fixing, terms and conditions of sale and dealings with competitors.

- **Conflicts of Interest**

Employees must avoid situations in which their personal interests could conflict, or even appear to conflict, with the interests of the supplier. Conflicts of interest arise when an individual's position or responsibilities with the supplier present an opportunity for personal gain of profit separate and apart from that individual's earnings from Vitrex Medical or where the employee's interests are otherwise inconsistent with the interests of Vitrex Medical. Among others outside employment or personal financial interests have a great potential for conflicts of interest. If the employee knows, or reasonably should know, that a personal interest may be in conflict with the interests of Vitrex Medical, the employee must consult the Company in advance.

- **Requirements relating to working and environmental conditions**

This code of conduct is based on internationally acknowledged UN and ILO conventions and sets out a minimum standard. The employment legislation applicable to the place of production shall be respected. Where national laws and regulations cover a topic that is also dealt with in this code of conduct, the higher standard shall apply.

1. Freely Chosen Employment (*ILO Conventions Nos. 29 and 105*)

2. Freedom of Association and the Right to Collective Bargaining (*ILO Conventions Nos. 87, 98, 135 and 154*)

3. No Child Labour (*UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146*)

4. No Discrimination (*ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women*)

5. No Harsh or Inhumane Treatment

6. Safe and Hygienic Working Conditions (*ILO Convention No. 155 and ILO Recommendation No. 164*)

7. Wages (*ILO Convention No. 131*)

8. No Excessive Working Hours (*ILO Convention No. 1 and 14*)

9. Providing Regular Employment

- **Conditions outside the workplace**

- 1. Consideration for Marginalized Populations**

1.1. Production and extraction of raw materials for production shall not contribute to the destruction of the resources and income base for marginalized populations, such as in claiming large land areas or other natural resources on which these populations are dependent.

- 2. Protection of the Environment**

2.1 Environmental measures shall be taken into consideration throughout the production and distribution chain ranging from the production of raw material to the consumer sale. Local, regional and global environmental aspects shall be considered.

2.2 National and international environmental legislation and regulations shall be respected.

Date: 27.02.2020

Name: Anders H. Pedersen

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Signature:



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