

Code of Conduct



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Becoming world-class – together, with integrity.

Dear Colleagues,

At MedSkin Solutions Dr. Suwelack AG, we are on a journey to become a world-class company – not just through innovation and performance, but through the way we act every day. How we collaborate, how we make decisions, and how we stand up for what is right. I truly believe that how we act every day is just as important as what we achieve.

Our Code of Conduct is more than a set of rules – it reflects our shared values of integrity, respect, and accountability. It serves as a compass for our daily actions, helping us navigate complex situations, align our behavior, and build trust – both inside and outside our organization.

We are sharing this Code of Conduct with you now as a first step – it will be followed by practical trainings and open dialogue formats to support you in applying it day to day.

Thank you for taking the time to engage with it – and for your commitment to building a culture we can all be proud of.

Together, we are shaping a culture of integrity – the foundation for sustainable success and the kind of company we all like to work for.

Kind Regards,

Diana Ferro
CEO & President



May 2025



2. Introduction

2.1 What we stand for – Our Values

Our company values represent what we stand for at MedSkin Solutions Dr. Suwelack AG (MDS). They are at the heart of our daily activities, our guidelines, and our Code of Conduct, which we would like to familiarize you with on the following pages.

Company Values

At MedSkin Solutions Dr. Suwelack AG, we develop, produce, and distribute regenerative medical devices and skin care products "Made in Germany" with innovation and passion. Our vision: "Being the partner of choice by advancing regeneration with science you can feel – by adding years to life and life to years!"

We are committed to the following values:

Customer first – yes, we care! We put our customers at the centre of everything we do and work constantly and passionately to satisfy our customers.

We value, support, and challenge our employees: The people at MDS, their talents, skills and performance are what make us who we are. That is how we make the difference! Our work is cross-functional and team-oriented. Independent, committed and with clearly defined goals in mind.

We strive for continuous improvement – of our customer relationships, our products and services and our partnership.

We develop new products and technologies: Our products speak for themselves! And the further development of our products, technologies and processes is the basis for achieving our goals. We continuously develop our products on the basis of scientific research and strive to make a positive impact on people's lives through innovation.

We strive for quality: Since 1997, the name MedSkin Solutions Dr. Suwelack AG has stood for trust, reliability, and high-quality products. We want it to stay that way.

We are committed to managing the social, ecological, and economic impact of our activities responsibly and in harmony with **environmental and nature conservation** and the expectations of our customers, our employees, and the public.

Our Code of Conduct addresses important issues relating to corporate ethics and provides our employees with an important framework for their decisions in their day-to-day work. It explains how we at MDS live and apply our values in specific situations.

2.2 Purpose and Scope of the Code of Conduct

Partnership and integrity are central elements of MDS's actions. Our company acts as a trustworthy and reliable business partner in all its activities.

Our Code of Conduct summarizes the globally applicable principles of our business activities. All the principles mentioned are equally important and the order in which they are listed is not based on their relevance.

Our Code of Conduct applies to the entire MDS Group and to all employees: to the Executive Board as well as to all managers, salaried and industrial employees and contracted consultants and interim managers. All persons acting at MDS are personally obliged to strictly adhere to the principles laid down in the Code of Conduct.

In cases of doubt, employees are expected to use their judgment in accordance with the Code of Conduct. Due to regional differences in national laws, the higher standard must always be observed - either the MDS Code of Conduct or mandatory legal requirements.

2.3 Responsibilities

All MDS employees must:

- follow the principles of the Code of Conduct,
- understand and apply relevant company guidelines.

They should be encouraged to ask questions, seek advice, and raise concerns in an environment where they do not have to fear retribution.

Line Managers have additional responsibilities:

- to promote a culture of integrity and create an environment in which questions and concerns can be addressed openly,
- to act as role models and provide guidance on ethical issues,
- to take responsibility for misconduct in their area of responsibility,
- to supervise employees appropriately and train them in relevant regulations,
- to ensure that violations of laws or the Code of Conduct can have serious consequences to clearly communicate that non-compliance with the Code of Conduct may result in disciplinary action.





2.4 Support and Advice

The Code of Conduct cannot cover every possible situation that employees may encounter during their employment. Employees are encouraged to ask questions and contact their line manager, the legal department (Legal) or the central People & Culture (P&C) function if they are unsure.

2.5 Reporting Concerns

MDS attaches great importance to an open and honest corporate culture and expects all employees to live these values in their day-to-day work.

Any violation of the Code of Conduct must be identified at an early stage, dealt with, and remedied immediately in order to prevent damage to the company, its employees and business partners. This requires everyone's attention to report any action or inaction that constitutes a breach of the Code of Conduct. Employees who identify violations of the Code of Conduct or applicable laws are encouraged to report their concerns to a trusted person (e.g. supervisor, P&C).

In addition, a confidential online reporting office is available, which MDS has set up on the basis of the EU Whistleblower Directive (EU) 2019/1937. Reports of breaches can be submitted [here confidentially](https://nordicwhistle.whistleportal.eu/WhistleBlower/Form/476-819-d804aab75c974405bd2e6b87d7f93377) and anonymously

(<https://nordicwhistle.whistleportal.eu/WhistleBlower/Form/476-819-d804aab75c974405bd2e6b87d7f93377>)

Employees who report violations in good faith need not fear retaliation or disciplinary action. However, wilfully providing false or misleading information may result in disciplinary action.



3. Labor Practices

3.1 Working Environment, Diversity, and Equal Opportunities

The knowledge, experience and entrepreneurial spirit of our employees determine the success of MDS. Managers should act as role models. The goal should be to identify, discuss, and change behavior that does not meet the ethical standards of MDS. Future incidents should be prevented.

Respected and promoted principles:

- MDS creates a working environment that offers professional development opportunities.
- Employment conditions and remuneration should encourage high performance and reward outstanding results.
- MDS supports a culture of diversity and inclusion, free from harassment and discrimination.
- Managers and employees promote open and honest teamwork.
- MDS respects the privacy and data protection of individuals.

Non-tolerated behavior:

- MDS does not tolerate any form of harassment or discrimination.
- Employment must never be illegal or unfair.
- Drug or alcohol abuse in the workplace is not tolerated.

3.2 Human Rights and Dignity

Human rights are moral principles and norms that define standards of behaviour and are protected by law as natural and legal rights. They are considered fundamental, inalienable rights of all people regardless of nationality, place of residence, religion, language, or other factors.

Respected and promoted principles:

- All business activities and cooperation within the company must be conducted in accordance with the generally accepted principles of human rights and human dignity.

Non-tolerated behaviour:

- MDS rejects any form of violation or restriction of human rights,
- These are in particular, but not exclusively, discrimination, slavery, torture, human trafficking or forced and child labor.





4.1 Health & Safety

MDS's business activities are subject to numerous laws, regulations, industry standards and contractual obligations that ensure a safe and healthy working environment for employees, business partners, customers, and suppliers.

Respected and promoted principles:

- MDS is committed to creating and maintaining a healthy and safe working environment.
- MDS actively promotes awareness of health and safety.
- Employees are required to be aware of health and safety guidelines and to report risks and unsafe conditions.
- MDS ensures that all employees and suppliers comply with relevant laws, regulations, and safety measures.

4.2 Environment

Business activities can have a significant impact on the environment. MDS is committed to managing its social, environmental, and economic impacts responsibly and in line with environmental and nature conservation and the expectations of customers, employees, and the public.

Respected and promoted principles:

- MDS controls the use of resources in order to avoid or reduce waste.
- MDS operates reuse measures to reduce waste.
- Materials are recycled in accordance with international standards.
- MDS consciously and responsibly takes ecological aspects into account with regard to innovations, product developments, manufacturing processes, internal policies, and the like.

4.3 Data Protection & Security

In addition to contractual confidentiality obligations, it is imperative to protect the confidential information of MDS, its customers, suppliers, and employees.

Respected and promoted principles:

- Confidential information may only be disclosed after written authorization or legal obligation.
- MDS complies with applicable data protection laws, in particular the EU General Data Protection Regulation (GDPR).
- Employees are obliged to comply with data protection laws and not to disclose sensitive information.

Non-tolerated behaviour:

- Employees may not disclose confidential information during or after their employment without authorization.

4.4 Dealing with Company Property

MDS uses assets such as buildings, plant, and equipment for its business activities.

Respected and promoted principles:

- The use of company resources is only permitted for legitimate business purposes.
- Efficient use and careful handling of resources is expected.

Non-tolerated behaviour:

- Members must protect company resources from misuse, theft, or destruction. Unauthorized private use is prohibited, for example company computer or mobile phone.

4.5 Company Books & Records

The business activities of MDS must be documented and disclosed in accordance with the law.

Respected and promoted principles:

- Accounting must be honest, accurate and in accordance with applicable laws.
- Company reports must accurately reflect reality.
- Documents must be archived in accordance with applicable retention obligations.

Non-tolerated behavior:

- Forgery or manipulation of business documents is strictly prohibited.

4.6 Business Continuity

Unforeseeable events such as fires, system failures or natural disasters require emergency plans to minimize business interruptions.

Respected and promoted principles:

- All MDS locations maintain documented emergency plans.
- Plans are regularly tested and optimized.





5.1 Bribery & Corruption

Bribery can go beyond monetary payments and also include gifts, travel, or other benefits. MDS rejects all forms of bribery and corruption.

Respected and promoted principles:

- Employees must familiarize themselves with anti-corruption laws and strictly comply with them.
- Suspicious incidents must be reported immediately.
- Suppliers must be carefully monitored.

Non-tolerated behaviour:

- Bribery and the giving or receiving of bribes of any kind are prohibited.

5.2 Gifts, Hospitality & Entertainment

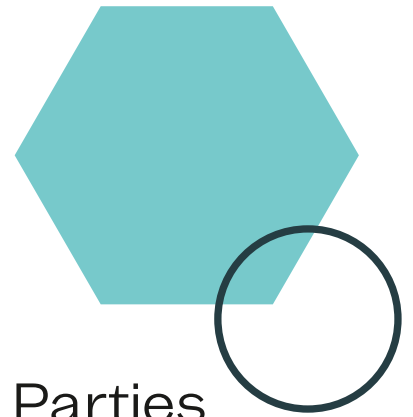
Gifts and invitations give the impression that the person giving or inviting expects benefits, especially in the case of high-value gifts or invitations, already any appearance of such conflict of interest or undue advantage must be avoided. For this reason, high-value gifts, gifts of money and financial benefits are generally not accepted or granted.

Respected and promoted principles:

- Gifts and invitations must be made transparently.
- Gifts must not imply any obligations or be unreasonably valuable.
- Granting and acceptance of high-value gifts (> EUR 35 netto) only in exceptional cases and provided that these are appropriate and not linked to any quid pro quo.
- Hospitality only in connection with business events.
- Appropriateness of invitation, e.g. business character of event (in particular no invitations to event gastronomy, catering for the guests corresponds to the framework of the event).
- No hospitality for private accompanying persons.
- No assumption of travel expenses (exception: speakers).
- Hospitality for public officials only with prior approval of manager.

Generally prohibited are:

- Gifts to government officials
- Cash gifts
- Sending gifts to private addresses
- Gifts to private persons of reference
- Framework or event location with tourist or high recreational value



5.3 Interactions with suppliers & Third Parties

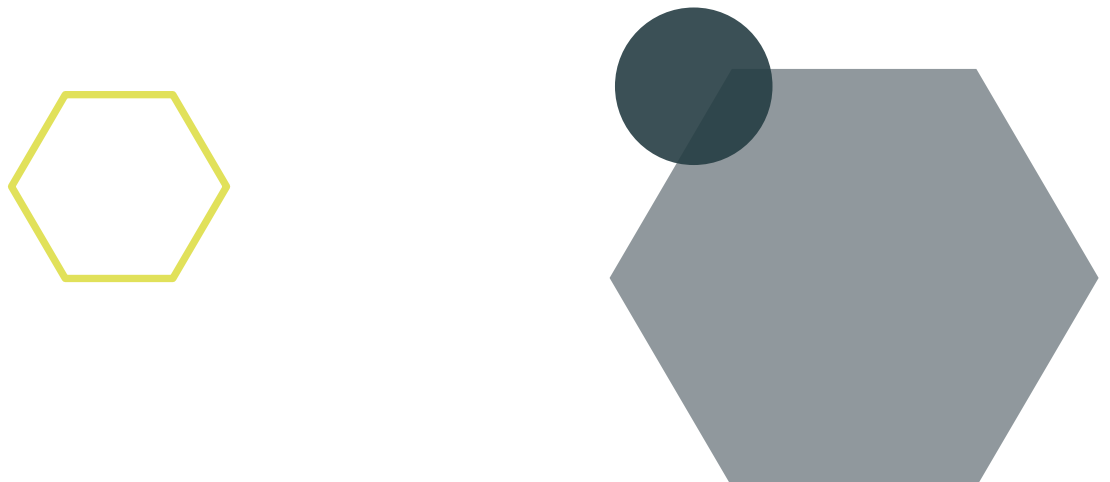
As a globally active company, MDS works with numerous suppliers and external partners. The selection of and cooperation with suppliers have a direct impact on the company's reputation and long-term success.

Respected and promoted principles:

- MDS expects its suppliers to comply with this Code of Conduct and to endeavor to enforce the same standards among their own suppliers.
- The cooperation is based on transparent, fair, and comprehensible criteria.
- Business partners are regularly reviewed to ensure that they continue to meet MDS standards.

Non-tolerated behaviour:

- Cooperation with suppliers who violate applicable laws or company guidelines.



5.4 Competition & Fair Trade

Antitrust laws around the world prohibit agreements and practices that restrict or manipulate competition. Violations can lead to severe penalties and legal consequences.

Respected and promoted principles:

- MDS acts with honesty, fairness and integrity and strives for competitive advantage through excellent products, not through unfair business practices.
- Customers, suppliers, and competitors are treated fairly.
- Business relationships with customers are independent of the activities of competitors.

Non-tolerated behaviour:

- Agreements with competitors on pricing, market allocation or customer allocation.
- "Bid rigging" (manipulation of tenders) or exchange of confidential information with competitors.
- Participation in meetings in which topics of concern under antitrust law are discussed.



5.5 Trade Controls

Cross-border trade in goods, services, technology, and intellectual property is subject to export controls, sanctions, and embargoes in many countries. Violations can have serious legal consequences.

Respected and promoted principles:

- MDS complies with all national and international trade regulations.
- Employees are obliged to familiarize themselves with the relevant regulations and to comply with them in their area of work.

5.6 Political Contributions

MDS is an economically independent company and does not participate in political financing.

Respected and promoted principles:

- Employees may engage in private political activities as long as their activities do not conflict with their work for MDS.
- If necessary, potential conflicts of interest must be disclosed.

Non-tolerated behaviour:

- MDS does not make any direct or indirect political donations to parties, political organizations, or public officials.



5.7 Charitable Donations

Donations are voluntary contributions to charitable causes for no consideration. In some countries, they are subject to legal requirements or tax obligations.

Respected and promoted principles:

- Donations must comply with the social and ethical principles of MDS.
- Every donation must be transparently documented and traceable.
- Donations only to charitable organizations.
- Donations in connection with sales transactions are generally prohibited.

5.8 Sponsoring

Sponsoring takes the form of bilateral agreements in which both parties provide certain services and consideration.

Respected and promoted principles:

- Sponsorship agreements must be recorded in writing and documented transparently.
- Sponsoring is primarily used for marketing and promotional purposes.

Non-tolerated behaviour:

- Sponsorship must not be misused as a means of obtaining undue advantages. Sponsoring only with approval of the management.





5.9 Conflicts of Interest

A conflict of interest exists if the personal interests of an employee conflict with the business interests of MDS.

Respected and promoted principles:

- Business decisions must be based on objective and commercial considerations, not personal gain.
- Potential conflicts of interest must be reported to the line manager immediately in writing.
- Business relationships with persons from the private sphere may only be entered into after consultation with MDS and after obtaining comparative offers.

5.10 Insider Trading

Insider trading refers to the purchase or sale of a company's securities on the basis of non-public, material information.

Respected and promoted principles:

- Employees must protect confidential business secrets of MDS, customers and business partners.

Non-tolerated behaviour:

- Employees may not disclose confidential information to third parties.



5.11 Money Laundering

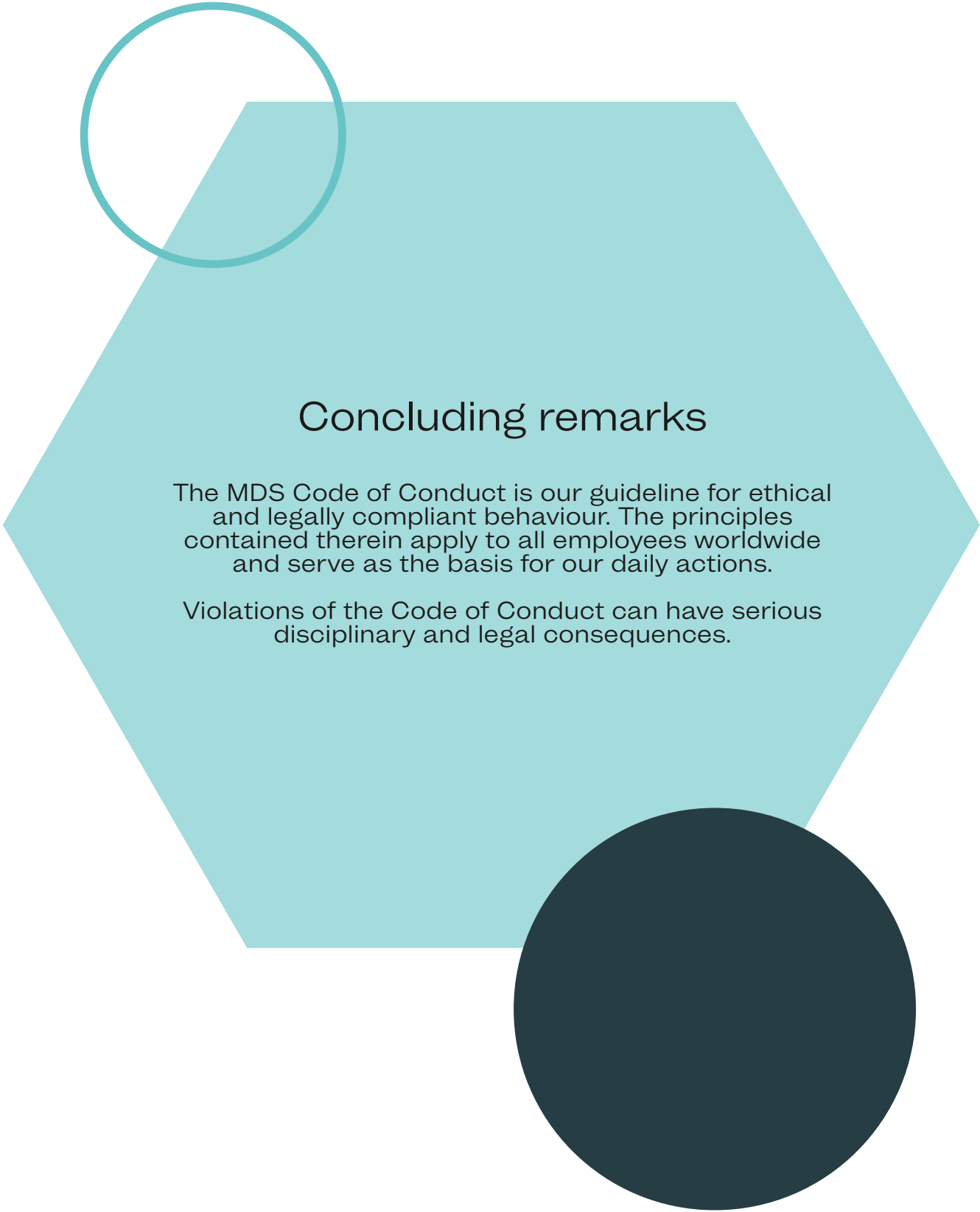
Money laundering refers to the conversion of illegally acquired financial resources into seemingly legal assets. It is often used to finance terrorism or to circumvent international sanctions.

Respected and promoted principles:

- MDS complies with all global anti-money laundering laws.
- Transactions are only concluded with reputable partners whose funds come from legitimate sources.
- Employees are obliged to collect and understand information about customers and business partners.
- Suspicious transactions must be reported.

Non-tolerated behaviour:

- MDS does not participate in transactions that are indicative of money laundering.
- MDS will not enter into any arrangements that conceal illegal cash flows.



Concluding remarks

The MDS Code of Conduct is our guideline for ethical and legally compliant behaviour. The principles contained therein apply to all employees worldwide and serve as the basis for our daily actions.

Violations of the Code of Conduct can have serious disciplinary and legal consequences.



medskin solutions

DR. SUWELACK

