



CODE OF CONDUCT OF THE UKM

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Dear employees,

Münster University Hospital (UKM) has a mission of public healthcare which is based on the inseparable combination of complex healthcare on the one hand and research and teaching on the other. It recognizes its resulting ethical and legal responsibility in the framework of the performance of its statutory duties, be it in the provision of medical care for its patients and continuing training for its employees or be it in the cooperation in research and teaching with the faculty of medicine of the University of Münster.

The purpose of this Code of Compliance is to promote the understanding of the legal, ethical and risk-related concerns that employees may encounter in their daily work. The Code describes the extensive responsibilities of employees and executives, provides an overview of the most important aspects of the company policy and at the same time promotes a culture of openness. Serving as a positive role model it is particularly the responsibility of those

in executive positions to act in keeping with this Code and to ensure that the employees are also aware of, understand and actively implement the ethical requirements.

The success of Universitätsklinik Münster is based on the dedicated work of each individual. The regulations contained in the Code form the framework of binding rules to be followed by all employees in the company and are intended to help them make the right decisions during their daily routine.

Through compliance, i.e. behavior that conforms to the rules, we gain trust in the outside perception and we are seen by our patients, business contacts and the public as a reliable partner in healthcare.

All of you contribute to this by observing and adhering to the principles of conduct contained in this Code of Compliance.

Thank you for your support.

Scope of Application

This Code of Compliance is a binding framework of orientation that forms the basis of our daily interactions. It is intended for the employees of Universitätsklinik Münster and its subsidiaries as well as the staff of the foundation Universitätsmedizin Münster.

Our Code of Compliance comprises the key requirements of conduct and sets out a binding minimum standard in accordance with the company's values as well as the social and legal framework conditions. Therefore all employees are required to know and observe the contents of this Code of Compliance.

Special rules, such as those contained in laws, regulations, codes of professional conduct, collective agreements, service agreements, internal guidelines etc., remain unaffected. If any of the above policies contain provisions that are stricter than those of this Code of Compliance, they shall take precedence.

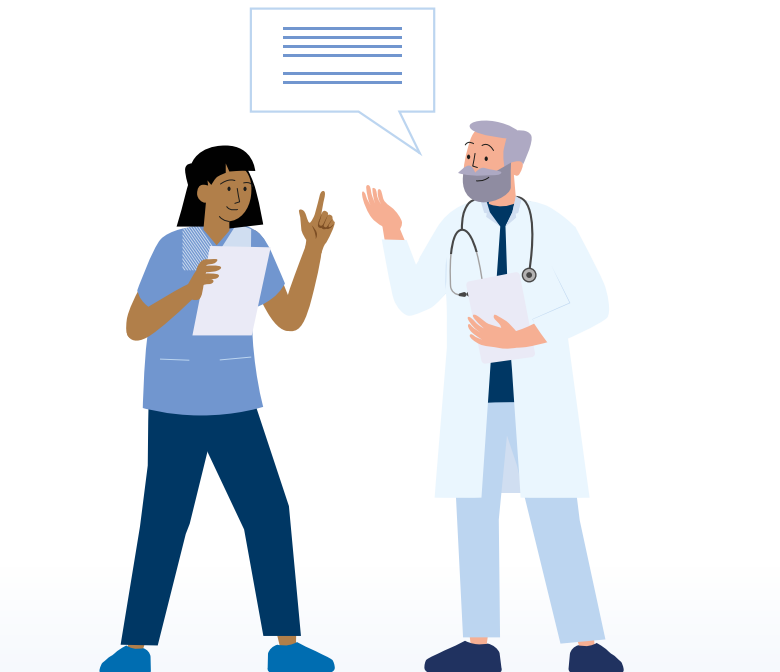


Interacting with Each Other and Third Parties

The culture practiced at the UKM promotes consideration, empathy and sincere appreciation.

Our interactions with each other and with third parties, such as patients and business contacts, are based on mindfulness and considerateness and characterized by open-mindedness without any bias.

We respect the individual rights and the privacy of all our employees. Our leadership is also determined by reliability, transparency, the elimination of a false culture of error and fear, openness and commitment.



Equal Opportunities, Equal Treatment, Discrimination

Nobody may be discriminated against based on their age, disability, gender, origin or any other personal characteristics. All employees shall have the same opportunities and be entitled to equal treatment.

The notion of equality of all people, irrespective of their gender, in all professional matters is essential to us. Moreover, we attach great importance to improving the compatibility of family and career and we contribute to this actively by our family-oriented human resources strategy.

We consider intercultural competence and the concept of integration and acceptance of diversity practiced in respect of all employees as well as non-violent communication as important components of our expertise.



Medical and Professional Excellence

As a university clinic we provide outstanding academic medical treatment at a supreme level. We strive to achieve the best possible care and safety for our patients. This requires a varied range of highly complex and interdisciplinary examination and treatment methods based on experimental diagnostics and therapy in inseparable cooperation with research and teaching. This high claim of quality of our medical and nursing services is also associated with the overall target of contributing to the prevention or the optimal healing of illnesses and the improvement of the patients' state of health in consideration of the patients' individual wishes and needs.



Respect of Human Rights

We respect human rights and labor standards throughout the supply chain. We reject inhumane work. We do not condone forced labor and child labor.

Fair and equitable payment is a matter of course which, in our understanding, also includes equal pay for equal work.

We not only expect the observance of these human rights from our own employees, but also from our suppliers and business partners.



Environmental Protection, Sustainability, Conservation of Resources

Acting responsibly towards our environment in a holistic approach is part of preventive health protection for patients and employees. Our employees are encouraged to act in an ecologically responsible manner in order to keep their environmental impact as low as possible. In this way, environmental protection is also factored into our business decisions.

The principle of sustainability practiced at the UKM also relates to the way we treat our employees as a resource. In this framework, we as a meaningful organization want to do justice to the values and norms of all generations.

We strive for sustainability in financing and cost control of services and activities.



Confidential Information, Doctor-Patient Privilege, Business Secrets

All employees are bound to secrecy with regard to confidential and patient-related information to which they have access and to safeguard professional and business secrets. They are subject to professional secrecy both within and outside the company. All statutory and internal regulations on data protection must be complied with.



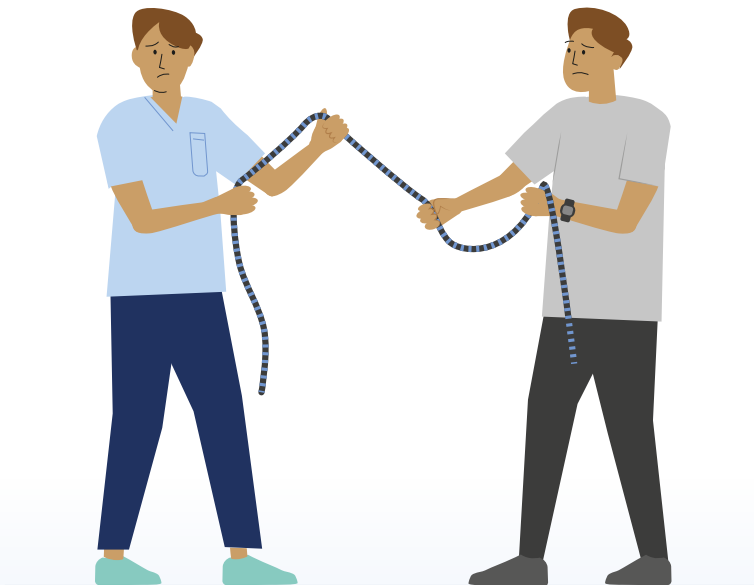
Information and Data Security

Data security has top priority at the UKM, especially when dealing with sensitive data of persons undergoing treatment. The UKM provides adequate protection of the availability, authenticity and integrity of data and information, as this constitutes the basic prerequisite for our daily work. Patient treatment as well as all associated information technology processes must be secured and maintained at the highest possible level. All employees share the responsibility for information security. They are required to use the data and information with the necessary sensitivity.



Handling Conflicts of Interests

In the interest and for the benefit of the UKM all services must be provided in an objective, fair and factual manner. A clear distinction must be made between official and private interests – colliding interests must be avoided. Potential conflicts of interest – e.g. due to ancillary activities, business interests etc. – must be fully disclosed to the UKM in advance so that any associated risks of official interests being affected can be eliminated.



Bribery / Corruption (Gifts, Hospitality, Invitations)

As a matter of principle, it is not permitted to accept rewards, gifts and other benefits, including cash, which are offered to employees in an official context by persons who have a business relationship with the UKM or are seeking to establish such a relationship. In the event that such offerings are accepted as an exception to the rule, the provisions of the staff regulations on the acceptance of gifts, rewards and other benefits must be observed.

Private invitations or hospitality offered to employees by industrial and other business contacts are inadmissible with the exception of hospitality that is customary and appropriate within the scope of their position.



Contributions (Sponsoring and Donations)

Sponsoring refers to contributions for which the grantor receives a consideration. Such contributions must always be documented in a written agreement and must be transparent and appropriate. Sponsoring may not be related to sales transactions or other services and may not influence any (procurement) decisions.

Donations are contributions made without expecting anything in return. Donations may only be accepted for the purposes specified in the UKM statutes and in compliance with the applicable internal regulations. The UKM may only make donations within the framework of the statutory provisions.



Tax Guidelines

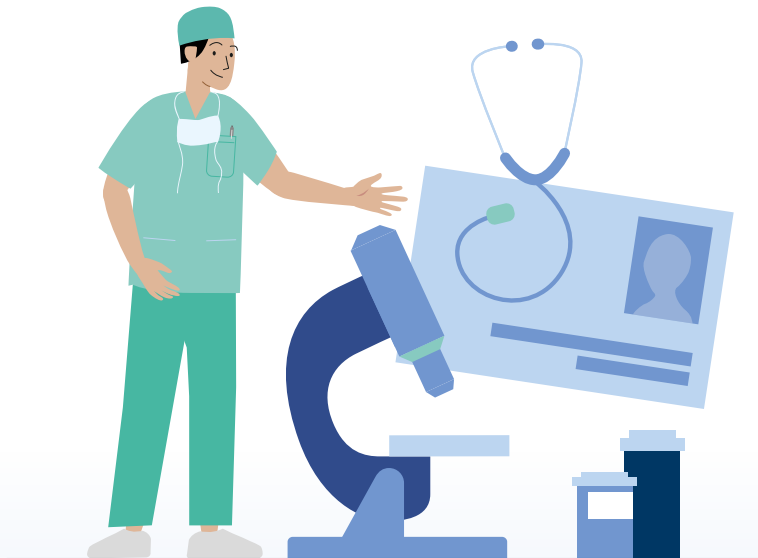
Employees are obliged to comply with all relevant tax laws as well as any internal tax and accounting guidelines and agreements.

We are continuously working on the improvement of processes, procedures and internal controls in order to ensure the effectiveness of our internal tax control system.



Use of Clinic Property

Company property must be handled with the utmost care. It must be protected against theft, loss and damage by members of the staff. This includes both tangible and intangible assets such as intellectual property, software and the like. The use of UKM resources is only permitted within the framework of employment.



Public Relations

Act responsibly – in your own interest and in the interest of the UKM.

Public statements of any kind on behalf of UKM may exclusively be made by the Executive Board, Corporate Communications or persons explicitly authorized to do so.

When you publish private posts or comments in social networks such as Facebook, Instagram, etc. about topics that are directly or indirectly related to your role as an employee at the UKM please take care that you do not appear to be making statements on behalf of the UKM.



Guidelines for the Compliance of the Code during Daily Work Routine

All employees are held to comply with the principles and regulations of this Code of Compliance. Executives are required ensure that their subordinates are familiar with the content of the Code of Compliance and observe its provisions.

The following questions can be used to check whether your own behavior conforms to the Code of Compliance:

- Is my decision and the resulting action legally and ethically correct and does it correspond to the values of the UKM?
- Are my acts influenced by personal interests that conflict with the interests of UKM?
- How does my behavior appear from the perspective of a third party?
- What impression would my behavior create in a media presentation?



Points of Contact

As a role model all executives bear a special responsibility and are aware of this fact. They will answer any questions you might have about the provisions of our Code of Compliance.

Moreover, the employees of Compliance and Insurance are trusted contacts to furnish information about the Code of Compliance and all compliance-related issues. They will be happy to provide support and advice if needed.

Act when you see a problem!

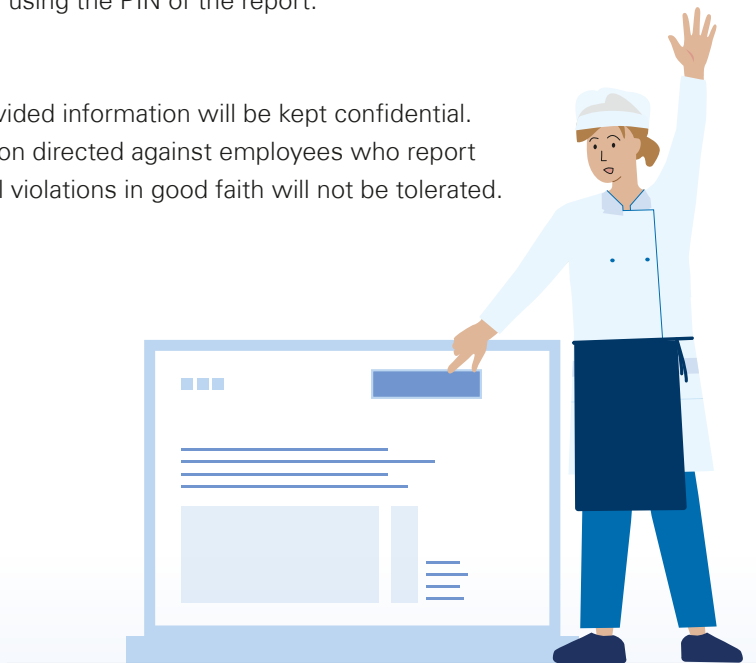


Reporting of Breaches

Employees are encouraged to report any violations of law or breaches of this Code of Compliance to the relevant executive or Head of Compliance and Insurance. Our whistleblower system is another internal reporting channel through which you can submit reports, either by using the “Critical Incident Reporting Portal” on the Intranet or by using the UKM website. The whistleblower system ensures a high standard of confidentiality and security so that a person making a report cannot be traced if the person wishes to remain anonymous.

Please note: If you make an anonymous report, there might be queries when the facts are established. Therefore, we kindly ask you to log into the system at regular intervals using the PIN of the report.

Any provided information will be kept confidential.
Retaliation directed against employees who report potential violations in good faith will not be tolerated.





medizinische
fakultät
Universität Münster



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