



## Code of Conduct for Suppliers and Business Partners

## Foreword from the Management Board

At corpuls, we believe that our suppliers and business partners play a vital role in our shared success. As a medical technology company, we have a special responsibility to ensure patient safety, maintain reliable product quality and act responsibly throughout our entire supply chain.

This Code of Conduct for Suppliers and Business Partners ("Code of Conduct") sets out the principles that guide our working relationships. It draws on internationally recognised standards, including the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the Core Labour Standards of the International Labour Organization (ILO). It also reflects the relevant European and German requirements concerning human rights, working conditions, environmental protection and regulatory compliance.

We recognise that businesses differ in size, industry and risk profile, and that there is no single approach to meeting these requirements. We therefore see this Code of Conduct as a shared point of reference. We encourage risks to be discussed openly and solutions to be developed together in a cooperative and constructive way.

We expect our suppliers to integrate the principles set out in this Code of Conduct into their own business operations and to promote them throughout their supply chains. We also encourage open communication and will support our business partners in implementing these principles wherever this is practical and appropriate.

Only by working together can we act responsibly and build lasting success.

Kaufering, July 2026

Signiert von:



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# 1. Introduction

This Code of Conduct sets out the core expectations of the corpuls Group (hereinafter referred to as “corpuls”) for all suppliers, contractors, service providers, agents and other business partners that provide goods or services to corpuls (collectively referred to as “suppliers”).

As an international medical technology company, we place patient safety, product quality, integrity and responsible business conduct throughout the entire supply chain at the heart of our business activities.

The requirements set out in this Code of Conduct are based on internationally recognised standards and applicable legal and regulatory obligations. They should be applied in a way that reflects the level of risk, taking into account the nature and scope of the products and services supplied and their potential impact on human rights, the environment, safety and compliance.

If local laws differ from the requirements set out in this Code of Conduct, the stricter standard should generally be followed to the extent permitted by applicable law. Each supplier's management is responsible for ensuring that the principles set out in this Code of Conduct are appropriately implemented throughout the organisation and embedded in internal processes and governance structures.

## What does this mean for our suppliers?

- You know which legal and regulatory requirements apply to your business and will make sure your activities comply with them.
- You will ensure that your employees are familiar with the rules of conduct and other requirements relevant to their roles and follow them in their day-to-day work.
- If requested, you will provide corpuls with reasonable support in meeting applicable legal, regulatory or legitimate customer requirements by supplying the necessary information, evidence and declarations.

# 2. Scope and Responsibility within the Supply Chain

The principles set out in this Code of Conduct apply to all suppliers and their employees, representatives and subcontractors who perform services for corpuls.

We expect our suppliers to put the principles of this Code of Conduct into practice within their own organisations and to share them throughout their supply chains. Within their sphere of influence and taking account of the relevant risks, our suppliers should use reasonable efforts to ensure that key requirements – particularly those relating to human rights, working conditions, environmental protection and the prohibition of forced labour – are also observed by their subcontractors.

## What does this mean for our suppliers?

- You will make the contents of this Code of Conduct available to your relevant employees and business partners.
- You will adopt a risk-based approach when selecting, assessing and managing your own suppliers, taking the key requirements of this Code of Conduct into account.

# 3. Integrity and Lawful Conduct

Integrity and compliance with applicable laws are essential to every business relationship with corpuls. We will not tolerate corruption, bribery, fraud, money laundering or any other form of unethical business conduct.

We also expect our suppliers to uphold the principles of fair competition. Agreements or concerted practices relating to prices, markets or customers, as well as any other anti-competitive practices, are prohibited. Conflicts of interest

should be avoided wherever possible; where they cannot be avoided, they must be openly disclosed. Our suppliers must also comply with all applicable export control, sanctions, customs and trade regulations.

#### **What does this mean for our suppliers?**

- You will not engage in any form of corruption, bribery, improper payments or benefits, fraud or money laundering, and you will implement appropriate policies and procedures to prevent such conduct.
- You will remain committed to free and fair competition, refrain from anti-competitive agreements or practices and ensure that your employees are appropriately trained in competition and antitrust law.
- You will identify potential conflicts of interest at an early stage, disclose them to corpuls and implement appropriate measures to prevent any improper influence on business decisions.
- You will comply with all applicable export control, sanctions and customs regulations and assess your business relationships for relevant risks before and during your cooperation with corpuls.

## **4. Human Rights and Working Conditions**

Respect for human rights is a core principle of responsible corporate governance. corpuls is committed to upholding internationally recognised human rights standards and expects the same commitment from its suppliers. Our business practices are guided in particular by the fundamental principles of the International Labour Organization (ILO).

Forced labour, child labour, human trafficking and all forms of modern slavery are strictly prohibited. All employees must be treated with dignity and respect; discrimination, harassment and retaliation have no place in our supply chain. Fair working conditions include fair pay, compliance with applicable laws on working hours and rest periods, and respect for the right to freedom of association in accordance with applicable law. Our suppliers must also provide a safe and healthy working environment that minimises risks to employees' physical and mental health.

#### **What does this mean for our suppliers?**

- You will prohibit all forms of forced labour, child labour, human trafficking and modern slavery – both within your own operations and throughout your supply chain – and will take appropriate remedial action and impose appropriate sanctions in response to substantiated violations.
- You will pay fair and appropriate wages that are at least equal to the applicable legal minimum and comply with all legal requirements relating to working hours and rest periods.
- You will respect freedom of association and the right to collective bargaining; if these rights are restricted by national law, you will seek to provide alternative means for employee participation and representation wherever possible.
- You will provide a safe and healthy working environment, implement appropriate health and safety measures and ensure that employees receive the training they need to perform their work safely.
- You will make employees aware of their rights and the standards that protect them, particularly those relating to the prohibition of forced labour, child labour and other human rights violations.

## **5. Environmental Responsibility**

The responsible use of natural resources is an essential part of sustainable business. corpuls expects its suppliers to comply with all applicable environmental laws and to take appropriate measures to reduce adverse impacts on the environment and the climate, including those arising from emissions, waste and the consumption of natural resources.

Our suppliers are expected to ensure the safe handling of chemicals and hazardous substances, as well as their lawful disposal. They must also comply with applicable rules and regulations governing chemicals and restricted substances, including REACH and RoHS. We encourage our suppliers to keep improving their environmental performance and to review their environmental measures on a regular basis.

**What does this mean for our suppliers?**

- You will make sure your activities comply with relevant national and international environmental requirements and take a precautionary approach when managing environmental risks.
- You will reduce emissions, waste and the consumption of natural resources wherever possible and promote the responsible use of water, energy and other resources within your business.
- You will handle chemicals and hazardous substances safely, dispose of them in accordance with the law and comply with relevant requirements such as REACH and RoHS.
- You will work towards establishing an environmental and energy management system that is appropriate for the size and nature of your business and continually improve your environmental performance.

## 6. Quality Assurance, Patient Safety and Regulatory Requirements

Product quality and patient safety are especially important in the medical technology sector. Suppliers whose products or services may influence product quality, patient safety or regulatory compliance are expected to have suitable quality management systems in place and to comply with all relevant standards and legal requirements.

**What does this mean for our suppliers?**

- If your products or services may affect product quality, patient safety or regulatory compliance, you will establish and maintain an appropriate quality management system (e.g. certified to ISO 9001 or other relevant industry standards).
- You will promptly notify corpuls of any non-conformities, quality defects or other issues that could affect patient safety, product quality or regulatory compliance.
- You will discuss any significant changes to products, processes or supply chains with corpuls in advance and ensure that such changes are implemented in a controlled manner.
- You will keep appropriate records of relevant activities and processes and provide corpuls with suitable documentary evidence upon request.

## 7. Data Protection, Information Security and Confidentiality

Protecting confidential information and personal data is extremely important to corpuls. All personal data must be processed in accordance with the General Data Protection Regulation (GDPR) and applicable national data protection laws. Confidential information and data must be handled responsibly, used exclusively for the agreed purposes and protected against unauthorised access, loss, misuse or disclosure.

If artificial intelligence (AI) systems are used, they should be deployed responsibly, transparently and in compliance with all applicable legal and regulatory requirements. Our suppliers should take particular account of the risks that AI may pose to data protection, confidentiality, information security and the reliability of work results.

**What does this mean for our suppliers?**

- You will implement appropriate technical and organisational measures to protect data and information systems, review them on a regular basis and update them where necessary to make sure they always reflect the current state of the art.
- You will ensure that confidential information and personal data can only be accessed by those who need to know it and will provide appropriate training for such employees.
- You will promptly notify the appropriate contacts at corpuls of any security incident or credibly suspected incidents involving corpuls or data processed on behalf of corpuls, and you will comply with all contractual and legal notification and reporting requirements.
- You will make sure that any AI systems you use are deployed responsibly and lawfully, while protecting data, maintaining information security and preserving confidentiality.

## 8. Supply Chain Due Diligence

corpuls expects its suppliers to appropriately identify and address risks within their own business operations and throughout their supply chains. This includes, in particular, risks relating to human rights, working conditions, forced labour, the environment and compliance.

### What does this mean for our suppliers?

- You will establish appropriate processes to identify, assess and mitigate relevant risks within your value chain, taking into account the size of your business and your risk profile.
- Upon request, you will provide corpuls with the information it needs to comply with its legal due diligence obligations, particularly those arising under applicable national or European legislation.

## 9. Audits, Monitoring and Enforcement

In order to verify compliance with this Code of Conduct, corpuls reserves the right to conduct appropriate reviews (e.g. self-assessments, document reviews or audits). We expect our suppliers to work with us openly and constructively and to provide the necessary information and access.

### What does this mean for our suppliers?

- You will support these reviews by providing transparent information, cooperating appropriately and allowing access to relevant documents and facilities.
- If any non-conformities are identified, you will implement appropriate corrective measures and demonstrate the effectiveness of such measures.
- In case of serious or repeated breaches, you should be aware that this may affect our business relationship and could even result in the termination of our cooperation.

## 10. Reporting and Whistleblower Protection

Being open about possible breaches or misconduct is an important part of working responsibly together. corpuls provides a confidential whistleblowing system that allows concerns to be reported securely and, if preferred, anonymously. Anyone wishing to raise a concern will be protected from unfair treatment; retaliatory measures will not be tolerated.

Written reports can be submitted through the following channels:

- Email: [whistleblowing@corpuls.com](mailto:whistleblowing@corpuls.com)
- Post: Whistleblower Office  
GS Elektromedizinische Geräte G. Stemple GmbH  
Hauswiesenstrasse 26  
D-86916 Kaufering  
(We recommend marking your correspondence as “confidential”)
- A contact form is available on our website ([www.corpuls.world](http://www.corpuls.world)) under “Whistleblower Protection System”

Reports can also be submitted verbally by appointment.

### What does this mean for our suppliers?

- You will promote an open culture within your organisation in which concerns can be raised and, where appropriate and legally required, you will establish your own reporting channels.
- You will inform your employees and relevant business partners about the reporting channels available at corpuls and ensure that anyone who raises a concern in good faith does not suffer any unfair treatment.

## 11. Final Provisions

This Code of Conduct forms part of the principles governing the contractual relationship between corpuls and its suppliers and supplements any human rights policy statements issued by corpuls. In working with corpuls, suppliers are expected to follow the principles set out in this Code of Conduct, put them into practice within their own organisations and communicate them appropriately throughout their supply chains.

Compliance with this Code of Conduct will be taken into account when selecting new suppliers and reviewing ongoing business relationships. corpuls reserves the right to update this Code of Conduct in response to legal and regulatory developments.

### **What does this mean for our suppliers?**

- You will regularly review your own practices to ensure they meet the requirements set out in this Code of Conduct and improve your processes and measures where necessary.
- You understand that compliance with this Code of Conduct is an important consideration when establishing and maintaining your business relationship with corpuls.