

 <b>FLEISCHHACKER</b>	<b>CODE OF CONDUCT, ETHICS &amp; CONFLICT OF INTEREST</b>	<b>MAN-01/ FOR-01</b>
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## 1.0 Introduction

This code of conduct must be followed and adhered to by all staff members of Fleischhacker, as well as 3rd party vendors who work or provide services in Fleischhacker’s capacity.

## 2.0 Key responsibilities

2.1 Upon signing of the employment contract, each member of staff should set out to fulfil professional responsibilities as indicated in the contract.

2.2 The objective of this document is for members of staff to discharge these responsibilities within the framework of this Code of Conduct and Ethics.

2.3 It should not be necessary to declare that we comply with the legal regulations in Singapore and other countries in which our company operates. Nevertheless, we draw the attention of all employees to the importance of consistently complying with this requirement.

2.4 In line with local regulations in Singapore, pharmacists in the employment of Fleischhacker have to be registered with the Singapore Pharmacy council (SPC), and further comply in addition with SPC’s Code of Ethics. The current version can be found in the following link: “<https://www.healthprofessionals.gov.sg/spc/forms-publications>”

2.5 We confirm that we support within the sphere of our influence the 10 principles of the UN Global Compact in the areas of human rights, labour, the environment and anti-corruption.

2.6 We adhere to the Categorical Imperative and commit ourselves to act only according to maxims that we would want to become a general law.

## 3.0 Conduct and Personal Responsibility

3.1 During daily activities, staff must maintain high standards of ethical conduct.

3.2 Staff is expected to be honest, dependable and have positive attitude.

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3.3 Staff must not use information available during the course of his work for any personal gain or to advance private interests.

3.4 Staff is expected to report the discovery of any misleading information or fraudulent transactions.

3.5 When our staff provides information or response to internal or external parties such as our customers and colleagues, it is expected that communication should be courteous, accurate to the best of our knowledge, truthful, objective and fair.

3.6 We do not tolerate any form of discrimination or harassment. This is especially true because of the different cultures in which we operate and the different backgrounds of our employees.

3.7 Managers bear a special responsibility because they exemplify the behavioural maxims we strive for.

#### **4.0 Attire and Hygiene**

4.1 Staff should dress appropriately for the activities to be performed.

4.2 Staff should practise good hygiene at all times.

#### **5.0 Professional competence**

5.1 All staff appointed to carry out work activities for Fleischhacker must have the relevant professional qualifications and experience.

5.2 Records of staff's academic and professional certificates must be kept.

#### **6.0 Safety**

6.1 We pay particular attention to the safety of our employees. This applies both to travel to difficult countries and to safety at work.

6.2 Staff must have a valid license and observe national regulations when driving vehicles.

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6.3 Staff must wear protective devices such as protective shoes, earplugs, goggles where applicable for the environment that work is being done in.

6.4 Travel to countries where there are travel warnings from the Ministry of foreign affairs of the origin country is forbidden unless approval provided in writing by top management.

## **7.0 Gifts and favours**

7.1 Staff shall not accept directly or indirectly, any favour or gift exceeding USD50 from any supplier or vendor. In exceptional cases or with uncertainties, please contact Managing Director. Otherwise, such transactions are expressly inadmissible. A signed release by Managing Director is required. This applies to solicitation as well.

## **8.0 Standard Operating Procedures**

8.1 Standard Operating Procedures are authorized work processes and should be followed by staff for the execution of tasks and work.

8.2 Appropriate documents and records as per the SOPs should be maintained.

## **9.0 Confidentiality and Conflict of Interest**

9.1 Staff must proactively observe confidentiality and carefully avoid situations of conflict of interest during the course of their work with Fleischhacker.

9.2 Staff must not have any vested commercial interest in obtaining access to any part of business information.

9.3 Any information or data from a manufacturer, customer or internal sales or financial information, for the possible purposes (but not limited to) of correct sourcing of the product specifications, supplier and product evaluation, submission of tender, etc should not be used or saved for personal use or other purposes.

9.4 We further implement data protection rules within the framework of legal regulations.

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## 10.0 Principles of the UN Compact

### 10.1 Human Rights

10.1.1 We support and respect the protection of human rights.

10.1.2 We uphold the freedom of association and the effective recognition of the right to collective bargaining.

10.1.3 We reject any form of forced or compulsory labour and expect the same from all our vendors and suppliers.

### 10.2 Child Labour

10.2.1 The products we sell are generally manufactured within the framework of industrial manufacturing processes that are not suitable for child labour.

10.2.2 Exceptions could be products with a high proportion of manual production. That does not apply to therapeutic products. In other business units for example surgical instruments and stainless steel goods are particularly suitable. In both cases, we have been working with the same companies for years, which have been visited and inspected/audited several times by our employees.

10.2.3 In this respect, we are certain that the products were manufactured without exploitative child labour in accordance with ILO Convention No. 1 and 2.

Applicable to	Procurement
Responsible for implementation, training and maintenance	General Management, HR and the business unit managers

### 10.3 Discrimination and equality

10.3.1 We intend to ensure that our company will provide equal opportunities and avoid discrimination.

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10.3.2 Every human being has the right to be evaluated without regard to origin, gender, religion, limitations, challenges or appearance. Our goal is to find a task which corresponds to their interests and current capabilities. We shall assign tasks which can be met instead of tasks they will likely not be able to perform.

Applicable to	All departments
Responsible for implementation, training and maintenance	General Management, HR and the business unit managers

#### 10.4 HR Control

10.4.1 Applications are passed on to the departments in a neutralised form. This concerns photo, name, nationality and age.

10.4.2 Every year, discussions are held with employees who are ill, severely handicapped or for some other reason have a limited ability to perform, with the aim of optimising the deployment of employees, creating a better working environment.

10.4.3 Twice a year, the remuneration lists are checked with the aim of detecting inequalities. The aim is to pay all employees in the same form (classification, basic salary, and other salary components) regardless of their gender.

10.4.4 The overall ratio between male and female employees is 50:50, whereby the trend in the professions described as classic male or female is fortunately becoming even.

#### 10.5 Environmental Policy

10.5.1 Fleischhacker is committed to minimizing the impact of its activities on the environment.

Applicable to	All departments, especially
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	Logistics/Warehouse, Procurement
Responsible for implementation, training and maintenance	The respective business unit managers

10.5.2 The key points of our strategy to achieve this are:

10.5.2.1 Minimizing waste and environmental pollution by evaluating operations and ensuring they are as efficient as possible.

10.5.2.2 Actively promote recycling both internally and amongst its customers and suppliers.

10.5.2.3 Source and promote a product range to minimize the environmental impact of both production and distribution.

10.5.2.4 Promote environmentally sustainable consumption of energy and water.

10.5.2.5 Meet or exceed all the environmental legislation that relates to the company.

10.5.2.6 In our procurement processes, we try to consolidate requirements as good as possible in regard to the number of procurement transactions and the related transport and CO2 emissions.

10.5.2.7 For international procurements and shipments to customers we apply sea transport where feasible.

10.5.2.8 Undamaged packaging and packaging materials that are suitable for reuse should be given priority in shipping. In doing so, it is important to pay strict attention to appropriate neutralization (e.g. removal of old markings and inscriptions).

10.5.2.9 Materials that are no longer suitable for reuse are collected as recyclable waste and handed over to external recycling companies. In the case of recyclable waste: strict attention must be paid to appropriate separation, e.g. paper/cardboard, plastics and wood.

10.5.2.10 Avoid any form of unnecessary printing and, if possible, use the duplex function of the printer.

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10.5.2.11 Every written communication with customers or suppliers is, wherever possible, carried out in electronic form (quotation, invoices, etc.).

10.5.2.12 When procuring new packaging materials, priority must be given to selecting and providing recycled products, for example: Upholstery materials such as paper or bog paper, upholstery foils (easily degradable); cardboard boxes and cardboard material.

## **10.6 Taxation, anti-corruption Prevention of money laundering, antitrust rules and prevention of money laundering**

10.6.1 Even though compliance with the following regulations may be self-evident we would like to summarise once again in writing the essential rules to which we are bound:

10.6.1.1 This regulation applies to all countries in which we do business or intend to do business in the future.

10.6.1.2 It shapes our behaviour towards both customers and suppliers.

10.6.1.3 we comply with legal regulations regarding taxation, anti-corruption, prevention of money laundering, anti-trust and prevention of money laundering.

10.6.1.4 Even if we only work with subcontractors in exceptional cases, we must ensure that our standards are also adhered to by these companies. Each business unit manager is responsible for informing and evaluating any partners accordingly. Compliance with the requirements set out in this document must be confirmed in writing by the business partner.

10.6.1.5 If there is any doubt as to the suitability of the company, the company shall be excluded from further cooperation.

10.6.1.6 Each of our employees is responsible for maintaining a high ethical standard in the conduct of business. This also includes the fact that we treat verbal agreements in the same way as contracts concluded in writing.

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10.6.1.7 We do not enter into business relations with employees of customers or with companies over which employees of customers can exert direct or indirect influence. The same applies to consultants who may be able to influence procurement decisions.

10.6.1.8 "Business relations" also includes the promise to enter into business relations at a later date. Of course, all payments (or the granting of other monetary advantages without business reason) are also inadmissible.

I will promptly inform Fleischhacker of any change in the above circumstances, including if any issue arises during the course of work.

I, \_\_\_\_\_(Name), FIN No: \_\_\_\_\_(NRIC), hereby, accept and agree with the conditions and provisions contained in this document.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

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**Declaration of Conflict of Interest and Confidentiality**

Conflict of interest is defined in this declaration as:

A situation in which professional or objective judgment, or behaviour concerning a primary interest (in this case the integrity and commercial interests of Fleischhacker) has been improperly influenced by a different interest (such as, but not limited to, financial gain by a contractor, employee or implementing partner (and/or his/her immediate family, close relatives or personal friends)).

To : Fleischhacker LLP (Thereafter known as the “Company”)

I hereby declare that :

- I have no pecuniary or other personal interest, direct or indirect, in any matter(s) that raises or may raise a conflict with my duties for the Company.
- I have pecuniary or other personal interest, direct or indirect, in the following matter(s) that raises or may raise a conflict with my duties as for the Company.

The particulars of such matters are stated below :

- 1) \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
- 2) \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

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3) \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

4) \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

In the event of a conflict of interest(s) above declared, I shall take appropriate steps to ensure that such conflicts of interest are resolved immediately and notify the management. I will make another declaration to state any change in any matter contained in this declaration within a month from this declaration.

**Confidentiality Undertaking**

I acknowledge that the process of carrying out of my duties with the Company will entail the receipt of confidential information of the Company, including technical specifications for products, and information about business methods, sources, prospects, costs, markets, pricing policies, operational methods, concepts, technical processes, applications and other trade secrets, as well as other business affairs and methods not generally available to the public (collectively, “Confidential Information”).

I hereby undertake (a) to keep the Confidential Information confidential and not to disclose it to anyone except if required by law or required by (c), (b) to ensure that the Confidential Information is protected with security measures and a degree of care that would apply to our own confidential information, (c) not to use any of the Confidential Information except for the necessary execution of duties outlined in the employment contract for the benefit of the Company.

**Summary**

I understand that I may be subjected to disciplinary action including but not limited to

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termination of my employment with the Company and further legal action may be taken against me if found to be deliberately failing to disclose pertinent information with regards to a potential conflict of interest and/or the non-observation of confidentiality undertaking.

Signature : \_\_\_\_\_

Name : \_\_\_\_\_

NRIC : \_\_\_\_\_

Date : \_\_\_\_\_

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