

# Code of Conduct

for the Olle Larsson Holding AG and all its subsidiaries worldwide

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## **Foreword of President of the Board**

Dear Colleagues

Being a globally operating company, the Olle Larsson Holding AG and its subsidiaries are not only subject to various laws and regulations throughout the world. We also have an ethical responsibility towards our clients, employees, business partners, the public and the environment.

In order to ensure compliance with applicable laws and regulations and to take our responsibilities seriously, we established this Code of Conduct. It provides general guidelines for our day-to-day business. It applies to all of us in equal measure, as each of our employees represents the Olle Larsson Holding AG and its subsidiaries throughout the world.

Please read this Code of Conduct thoroughly and let us all act accordingly.

Thank you for your commitment.

Sincerely

Michael Larsson

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## 1. **Purpose and Scope of the Code of Conduct**

In accordance with the UN Global Compact<sup>1</sup> and OECD Guidelines for Multinational Enterprises<sup>2</sup> we integrate sustainability and corporate responsibility into our business.

This Code of Conduct shall globally contribute to meeting highest ethical and legal standards in development, production, sales, product support and providing services.

In addition to adherence to applicable laws and regulations, this Code of Conduct has to be complied with even if it demands higher standards than applicable laws and regulations. It applies to all employees of the Olle Larsson Holding AG and its subsidiaries (together herein after referred to as "**the Company**" or "**OLH**") in all entities worldwide, unless specific local amendments have been implemented. Please refer to the OLH legal department in case of any uncertainties.

This Code of Conduct gives us orientation to make the right choices. However, it will not answer all questions you might have. As additional sources of information, we established more detailed policies to complement this Code of Conduct:

- Whistleblowing Policy
- Policy on Interactions with Healthcare Professionals (HCPs) and HCP Entities
- Policy on Use of IT Systems and Social Media
- Policy on Data Protection
- Third Party Compliance Policy
- Policy on Behaviour in Competition
- Document Creation and Retention Policy
- Policy on Product Compliance and Product Safety

The absence of specific guidance, however, does not relieve Company personnel of the responsibility for operating with the highest ethical standards of business conduct.

## 2. **Questions, Doubts and Concerns**

We are only able to find the best solutions and to prevent misconduct if our employees interact with us. Thus, if you have any questions or doubts regarding this Code of Conduct do not hesitate to contact the OLH legal department. They

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<sup>1</sup> <https://www.unglobalcompact.org>

<sup>2</sup> <http://www.oecd.org/corporate/mne>

will provide you with all the support and information needed to meet your obligations. The same applies if you notice any potential violations of this Code of Conduct.

Confidentiality of your reports of questions, doubts and concerns will be preserved as much as possible. Apart from compliance with this Code of Conduct our employees also have the obligation to report possible infringements. For further information, please refer to our ***Whistleblowing Policy***.

The Company is committed to a policy of non-retaliation. Therefore, you do not have to fear negative consequences when reporting allegations, even if you are not absolutely certain about the facts, provided that the report is made in good faith. We do not tolerate threats or acts of retaliation against you for raising your concerns. However, intentionally using the reporting system and this policy for abusive practice (i.e., filing reports in bad faith) is prohibited and may not only result in disciplinary measures, including but not limited to termination of employment.

### 3. **Violation and Consequences**

Violations of this Code of Conduct can have severe consequences for the Company and individual employees.

The Company might suffer reputational damage. It could also be held liable, in particular under civil law, criminal law and/or by regulatory authorities.

Therefore, the Company monitors and audits compliance with this Code of Conduct. We will strictly pursue any violations of this Code of Conduct with disciplinary measures, up to and including termination of employment.

### 4. **Fundamental Responsibilities**

#### 4.1 **Protection of Human Rights**

We support and respect the internationally recognised human rights as stated in the UN Universal Declaration of Human Rights<sup>3</sup>. We do not accept any violations of these rights and will intervene in the case of adverse events.

#### 4.2 **Compliance with Laws and Regulations**

We act compliant with applicable national and international laws and regulations, as well as our Company policies and other Company guidelines. It is the duty of every employee to know and adhere to these.

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<sup>3</sup> <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

## 5. **Employment**

We support and respect the internationally recognised fundamental principles and rights at work as stated in the ILO Declaration on Fundamental Principles and Rights at Work<sup>4</sup>.

### 5.1 **Non-Discrimination**

All of our employees will always be treated with respect and dignity. Equal qualification, experience and performance are remunerated equally.

We do not tolerate any discrimination because of political party affiliation, race, skin colour, gender, sexual orientation, marital status, pregnancy, religion, political opinion, nationality, ethnical background, social heritage, social status, disability, age, trade union membership, and all other attributes protected by applicable laws and regulations.

### 5.2 **Conditions of Employment**

Our goal is to provide decent working conditions.

We do not perform forced labour. Our employees may leave the Company within the statutory or contractually agreed time.

Fair and reasonable remuneration is important to us. Our employees receive at least the local minimum wage in their sector. Working hours correspond to the applicable laws and regulations and are reasonable.

We do not employ minors under the minimum employment age of 15 (14 in countries with less developed educational systems) years according to Sec. 2.4 of the International Labour Organisation Convention Nr. 138<sup>5</sup>. Our primary interest is to ensure the well-being and to support the personal and professional development of employees.

## 6. **Environmental Protection**

We consider the need to protect the environment and to mitigate climate change. Therefore, non-renewable resources are used with care and responsibility. We promote operational procedures reducing our environmental footprint as well as an ecologically sustainable product and service development.

## 7. **Quality of Products and Product Safety**

Product safety is of utmost importance to the Company. It is also vital for the Company's reputation and success. Therefore, we strive towards the highest quality and aim for constant improvements.

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<sup>4</sup> <https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm>

<sup>5</sup> [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C138](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138)

We develop, produce and market our products in compliance with applicable laws and regulations. Our products are being monitored in line with legal obligations. We also make sure that responsible authorities are informed about product issues based on the applicable laws and regulations. Also we make sure to take the necessary actions and to give proper instructions in order to ensure safe and proper use of our products.

All employees have the duty to report any concerns regarding product safety or quality with no delay. Please also see and comply with our ***Policy on Product Compliance and Product Safety***.

## 8. **Health and Safety**

Meeting the applicable laws and regulations, we are ensuring our employees' occupational health and safety.

Additionally, everyone must commit himself/herself to establishing and maintaining a safe work environment. To avoid risks, safety procedures have to be carried out as required by applicable laws and regulations. Any threats to health and safety must be reported immediately.

## 9. **Data Protection and Confidentiality**

### 9.1 **Personal Data**

We highly value data protection, privacy as well as data security requirements. We comply with locally applicable data protection laws and regulations as a minimum standard for our business conduct.

Personal data needs to be adequately protected. Therefore, we only collect and process personal data for particular specified business and other legitimate purposes and ensure that it is secured against unauthorized access. In order to prevent unauthorized access, personal data is only transmitted with safety measures in place. When processing sensitive data, conducting internal investigations and/or compliance controls, we adhere to applicable data protection and labor laws and regulations as well as to our respective policies.

The Data Protection Officer or your Local Data Protection Contact Person will support you on all matters relating to data protection. Please also see and comply with our ***Policy on Data Protection***.



## 9.2 **Business Information, Data and Documents**

Company information needs to be used with integrity. We only work with approved software and hardware and handle passwords carefully. Business information will only be transferred to authorized parties.

Our employees shall choose passwords according to password safety standards and are obliged to change passwords periodically. They must ensure that third parties cannot access Company information when leaving their workstation.

Please also see and comply with our ***Policy on Use of IT Systems and Social Media*** and our ***Document Creation and Retention Policy***.

## 9.3 **Social Media and Emails**

Our employees may make postings about the Company and its products and services on social media, but they must clearly identify their postings as personal and their own. The Company shall not be held liable for any repercussions the employees' content may generate. Dishonorable content such as racial, ethnical, sexual, religious and disability slurs and defamatory statements are not tolerated. Employees' postings shall comply with all applicable laws and regulations, especially intellectual property and data protection laws and regulations, and shall not contain proprietary or confidential information or personal data relating to the Company or its employees, business partners and customers. The Company reserves the right to require any employee to edit, amend or delete any dishonorable, misleading, inaccurate, unlawful or otherwise detrimental content relating to the Company and its products and services posted on social media by that employee.

Our employees shall communicate via email efficiently, professionally and not for private purposes. Emails shall only be used to the extent necessary. For further information please see and comply with our ***Policy on Use of IT Systems and Social Media***.

## 10. **Respect of Property**

### 10.1 **Company Assets**

Our employees must handle our property with responsibility and protect our assets against loss, theft, damage or unauthorized use.

Without explicit permission the Company's property, including but not limited to, financial funds and office supplies, may not be used for private purposes or removed outside its standard location. If personal use of certain assets, such as Company cars or mobile devices, is allowed, our employees always have to ensure that these assets are only used as intended and reasonably.

Please also see and comply with our ***Policy on Use of IT Systems and Social Media*** and our ***Policy on Data Protection***.

Contrary actions may not only result in disciplinary measures, including but not limited to termination of employment, but also civil proceedings and criminal prosecution.

## 10.2 **Intellectual Property and Confidential Information**

Intellectual property is the foundation of our Company's success. Examples for intellectual property are prototypes, product concepts, marketing or sales plans.

Our employees all have the responsibility to keep confidential information safe. They shall in particular not inform any unauthorized person, including family and friends. Confidential information may only be discussed after ensuring that no unauthorized party is able to overhear the conversation.

We also respect our business partners' and customers' intellectual property and confidential information. Our employees will not use any proprietary or confidential information that they became aware of as a result of their employment, abusively or for their own personal gain. Our employees shall only use software and technology belonging to the Company or if we are in possession of a proper license.

## 11. **Anti-Corruption**

### 11.1 **General Rules**

We are committed to combat corruption. Corruption is a major threat as it may lead to criminal penalties and substantial damage of the Company and our employees. The Company communicates transparently with public authorities to help prevent and combat corruption.

We do not tolerate corruption - anywhere. Alleged regional customs do not lift the ban on corruption, even if this means to the Company losing business with a certain business partner.

This Code of Conduct provides general guidance about anti-corruption issues. Interactions with Healthcare Professionals may be subject to more stringent requirements and rules. Please see and comply with our ***Policy on Interactions with Healthcare Professionals (HCPs) and HCP Entities***.

Our employees shall never, directly or indirectly, offer, promise, give or demand anything of value in order to obtain business or for any improper advantage. They shall avoid any actions that might lead to the perception of improperly influencing someone's business or being improperly influenced by third-parties due to any kind of advantage granted.

Cash or its equivalents may never be offered, granted, demanded or accepted.

Definitions:

**Public Official:** Any individual who is an elected official, officer, employee or member of any government, government-owned or government-controlled entity or organization. An individual who fulfils official duties is subject to the same provisions as Public Officials.

**Public Entity:** Any entity which is government-owned or government-controlled. An entity which fulfils official duties is subject to the same provisions as Public Entities.

## 11.2 **Facilitation Payments**

Our employees shall apply specific caution when dealing with Public Officials or Public Entities. Facilitation payments to Public Officials and Public Entities are strictly forbidden. Facilitation payments are any advantages granted to ensure that a Public Official or Public Entity fulfills his duties quicker than usual.

The exclusion of facilitation payments applies even if such payments are not prohibited by applicable laws and regulations.

## 11.3 **Gifts and Invitations**

Our employees shall not, directly or indirectly, ask for any kind of benefits, such as favors, gifts or invitations (for example to meals or events). We also handle giving benefits to customers, business partners and other third parties very carefully.

Gifts and invitations to meals or other comparable amenities should not be offered to individuals, groups of individuals and/or entities or accepted by individuals/entities of OLH if their value, scope and timing may appear to influence our business, for example if the impression arises that a consideration is expected from the respective individuals, groups of individuals and/or entities.

The value of gifts must be calculated based on the price that is commonly paid in the market where the recipient is based. For example, if a gift is purchased in Switzerland for CHF 20, offered to a business partner based in Vietnam and the Vietnamese market value is CHF 40, the market value of CHF 40 is relevant for the calculation. If OLH products are offered their value must be calculated based on the sales price.

The following thresholds apply in principal and are subject to the rules set out in this Code of Conduct. Deviating thresholds can be stipulated otherwise in a local amendment to this Code of Conduct for specific regions.

All thresholds apply to individuals. If gifts or invitations shall be offered to or shall be accepted by groups of individuals or entities, the threshold is calculated from the total amount divided by the number of individuals that receive gifts

and/or invitations. If gifts and/or invitations are not distributed equally, the actual value of the gifts and/or invitations per individual is applicable.

- **Gifts** with a value of up to CHF 10 per person do not require approval or documentation. **Invitations** with a value of up to CHF 30 per person do not require approval or documentation. In those cases the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.
- **Gifts** with a value of more than CHF 10 and up to CHF 40 per person do not require approval. However, they have to be documented in the Gifts and Invitations Form. **Invitations** with a value of more than CHF 30 and up to CHF 60 per person do not require approval. However, they have to be documented in the Gifts and Invitations Form. In cases where approval is not necessary the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.
  - Please see and use the ***Gifts and Invitations Form***.
- **Gifts** with a value of more than CHF 40 and up to CHF 75 and **invitations** with a value of more than CHF 60 and up to CHF 100 per person require approval from the Local Compliance Contact Person. Please contact the legal department if in doubt who the Compliance Contact Person in the respective local entity is.
  - Please see and use the ***Gifts and Invitations Form***.
- **Gifts** with a value of more than CHF 75 and **invitations** with a value of more than CHF 100 per person require approval from the OLH legal department.
  - Please see and use the ***Gifts and Invitations Form***.

	Documentation: X Approval: X	Documentation: ✓ Approval: X	Documentation: ✓ Approval by Local Compliance Contact Person: ✓	Documentation: ✓ Approval by OLH Legal Department: ✓
Gift	Up to CHF 10 per person	CHF 10 up to 40 per person	CHF 40 up to 75 per person	More than CHF 75 per person
Invitation	Up to CHF 30 per person	CHF 30 up to 60 per person	CHF 60 up to 100 per person	More than CHF 100 per person

The values indicated above are including beverages, tips and VAT.

The offering and accepting of a benefit must always be - even if below any thresholds mentioned above - within the boundaries of business appropriateness. The overall number of gifts and invitations offered to or accepted by one party always has to be reasonable. There has to be a

determined business occasion and the gift or invitation always has to be limited to a reasonable scope.

The following gifts and invitations are prohibited without exception:

- Cash or its equivalents;
- Gifts and invitations that the other party specifically requests;
- Gifts and invitations aimed at influencing someone's business decision or granted as gratitude or reward for business decisions.

The following applies to the documentation and approval process:

- The specific forms must be used.
- Approval should be obtained in advance and thus before offering or accepting the benefit.
- In individual cases, it may be difficult to obtain approval in advance. This is particularly the case when accepting benefits, for example if the benefit is sent unsolicited by mail to the employee, if the employee cannot immediately assess the value of the benefit when accepting it or if the benefit is part of a formal occasion and refusing to accept it would be inappropriate for reasons of politeness. In such cases, the employee must obtain approval afterwards without delay.

If a gift or invitation cannot be accepted, our employees have to reject politely, but determinedly.

If the benefit was already accepted but approval is not granted or the benefit is one that is prohibited without exception, the employee must immediately return the benefit to the person offering it.

If it is not possible to refuse to accept a benefit or return an accepted benefit for reasons of politeness or for other reasons in individual cases, the employee must inform the OLH legal department. The OLH legal department will then review the individual case and decide whether the benefit can be retained or used. This decision is to be documented as appropriate.

Interactions with Healthcare Professionals may be subject to more stringent requirements and rules. Please see and comply with our ***Policy on Interactions with Healthcare Professionals (HCPs) and HCP Entities***.

#### 11.4 Donations and Sponsoring

The Company may not use donations and sponsoring to improperly influence or reward past, present or potential future use or support of the Company's products, in particular of the sponsoring recipient. Influence that results from

the marketing activity itself, conducted within the sponsoring, is generally not considered to be improper.

Donations and sponsoring to Healthcare Professionals may only be exercised subject to specific conditions set out in our ***Policy on Interactions with Healthcare Professionals (HCPs) and HCP Entities***.

## 12. **Lobbying**

In case of political lobbying, the Company acts transparently and in compliance with applicable laws and regulations.

Lobbyists have to disclose their function as a representative for the Company and must publicly declare our Company's interest.

They shall take particular care to avoid any impression of causing a violation of duties by a Public Official or Public Entity.

We engage lobbyists only by written contract prior to the beginning of any service, performance or payment. This contract must clearly stipulate the services to be rendered and the remuneration. The actual receipt of services performed (e.g. lobbying contacts), reimbursed time or expenses must be documented and the remuneration must reflect the services rendered adequately.

## 13. **Conflicts of Interest**

Conflicts of Interest may arise if any activity, relationship or interest may provoke doubts about one's ability to act objectively and with integrity.

Our employees shall follow objective business criteria leaving out any private interests when making business decisions. This is essential, as Conflicts of Interest create risks for the reputation of each individual and the Company.

In case of possible Conflicts of Interest our employees are obliged to alert the legal department immediately. They will help to find a valuable solution.

### 13.1 **Family and Close Friends**

Private relations should not influence business. Business partner relations with family members and close friends of our employees may only be entered into after the legal department has been consulted. The decision if the business relation is entered and/or pursued must be based solely on objective criteria, such as quality and price.

### 13.2 **Secondary Employment**

In order not to influence motivation and performance secondary employments at competitors are prohibited. Secondary employment at one of our business partners is prohibited without authorization, as this could lead to a conflict of

interest. If an employee considers such a secondary employment he has to obtain prior authorization from the legal department.

### 13.3 **Investments**

Investing in competitors or business partners should be avoided, if their management could be affected by the investment.

### 13.4 **Insider-Deals**

We treat insider information as confidential. We do not improperly use any knowledge that is not public and that was gained during performance of our duties.

Our employees shall not use insider knowledge for private trading and shall not share it with anyone without prior written authorization by an authorized Company representative. This also applies to family and friends.

### 13.5 **Self-Contracting**

We do not perform self-contracting. Our employees shall not as a representative of the Company enter into a contract with themselves or with a third party that is being represented by the same employee without prior written authorization by an authorized Company representative.

## 14. **Fair Competition**

The Company is committed to fair competition. This benefits all market participants. We perform our activities in a manner consistent with all applicable competition laws and regulations considering all jurisdictions in which anti-competitive effect might arise due to our business activities.

Our employees shall not make anti-competitive agreements with our competitors, such as fixing prices, output restrictions, sales conditions, rigged bids or allocations of markets. Anti-competitive contacts with distributors, suppliers or customers are also strictly forbidden.

Please also see and comply with our ***Policy on Behaviour in Competition***.

## 15. **Anti-Money-Laundering**

We fully support international actions against money laundering.

Money is laundered by slipping assets originating from criminal offences into the regular economic circle.

In order to prevent money laundering our employees must take special care when any questionable financial transactions are requested by customers, business partners or other third parties. They must not tolerate or participate in any misuse of the Company for illegal activities.

16. **Trade Controls and Sanctions**

The purpose of international trade control and sanctions is to prevent the supply of certain people, organizations or countries, especially those associated with terrorism or money laundering, with financial resources or specific goods.

In order to support this purpose, the Company and its employees comply with international trade control laws and regulations.

17. **Business Partners**

By doing business with a large number of distributors, suppliers and agents all around the world, it is of substantial value for us to only work with reputable business partners who comply with applicable laws and regulations and the provisions in their contracts with the Company. Therefore, we take special care in selecting and supervising of these business partners.

Please also see and comply with our ***Third Party Compliance Policy***.

The contracts of business partners with the Company should in addition refer to the Third Party Code of Conduct. If the contracts with the Company contain more specific or different provisions, the provisions in those contracts shall prevail.



## **Local Amendment for China**

By way of **derogation of section 11.3** of the group-wide applicable Code of Conduct, the following applies if:

- The recipient of the gift or invitation is based in China;
- The interaction with the recipient of the gift or invitation takes place in China;
- The interaction with the recipient of the gift or invitation has any other connection to China.

In case two or more local amendments are applicable, please apply the local amendment with the more stringent requirements and rules.

Please refer to the OLH legal department in case of questions or uncertainties regarding the applicability of this local amendment.

All other sections of group-wide applicable Code of Conduct remain unaffected.

### **Gifts and Invitations**

Our employees shall not, directly or indirectly, ask for any kind of benefits, such as favors, gifts or invitations (for example to meals or events). We also handle giving benefits to customers, business partners and other third parties very carefully.

Gifts and invitations to meals or other comparable amenities should not be offered to individuals, groups of individuals and entities or accepted by individuals/entities of OLH if their value, scope and timing may appear to influence our business, for example if the impression arises that a consideration is expected from the respective individuals, groups of individuals and entities. Only gifts and invitations of low value may be offered or accepted.

The value of gifts must be calculated based on the price that is commonly paid in the market where the recipient is based. For example, if a gift is purchased in Switzerland for CHF 20, offered to a business partner based in China and the Chinese market value is CHF 40, the market value of CHF 40 is relevant for the calculation. If OLH products are offered their value must be calculated based on the sales price.

The following thresholds apply in principal and are subject to the rules set out in this Code of Conduct. Deviating thresholds can be stipulated otherwise in another local amendment to this Code of Conduct for specific regions.

All thresholds apply to individuals. If gifts or invitations shall be offered to or shall be accepted by groups of individuals or entities, the threshold is calculated from the total amount divided by the number of individuals that receive gifts

and/or invitations. If gifts and/or invitations are not distributed equally, the actual value of the gifts and/or invitations per individual is applicable.

- **Gifts** with a value of up to RMB 60 per person do not require approval or documentation. **Invitations** with a value of up to RMB 200 per person do not require approval or documentation. In those cases the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.
- **Gifts** with a value of more than RMB 60 and up to RMB 250 per person do not require approval. However, they have to be documented in the Gifts and Invitations Form. **Invitations** with a value of more than RMB 200 and up to RMB 350 per person do not require approval. However, they have to be documented in the Gifts and Invitations Form. In cases where approval is not necessary the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.
  - Please see and use the ***Gifts and Invitations Form***.
- **Gifts** with a value of more than RMB 250 and up to RMB 500 and **invitations** with a value of more than RMB 350 and up to RMB 500 per person require approval from the Local Compliance Contact Person. Please contact the legal department if in doubt who the Compliance Contact Person in the respective local entity is.
  - Please see and use the ***Gifts and Invitations Form***.
- **Gifts** and **invitations** with a value of more than RMB 500 per person require approval from the OLH legal department.
  - Please see and use the ***Gifts and Invitations Form***.

	Documentation: X Approval: X	Documentation: ✓ Approval: X	Documentation: ✓ Approval by Local Compliance Contact Person: ✓	Documentation: ✓ Approval by OLH Legal Department: ✓
Gift	Up to RMB 60 per person	RMB 60 up to 250 per person	RMB 250 up to 500 per person	More than RMB 500 per person
Invitation	Up to RMB 200 per person	RMB 200 up to 350 per person	RMB 350 up to 500 per person	More than RMB 500 per person

The values indicated above are including beverages, tips and VAT.

The offering and accepting of a benefit must always be - even if below any thresholds mentioned above - within the boundaries of business appropriateness. The overall number of gifts and invitations offered to or accepted by one party always has to be reasonable. There has to be a determined business occasion and the gift or invitation always has to be limited to a reasonable scope.

The following gifts and invitations are prohibited without exception:

- Cash or its equivalents;
- Gifts and invitations that the other party specifically requests;
- Gifts and invitations aimed at influencing someone's business decision or granted as gratitude or reward for business decisions.

The following applies to the documentation and approval process:

- The specific forms must be used.
- Approval should be obtained in advance and thus before offering or accepting the benefit.
- In individual cases, it may be difficult to obtain approval in advance. This is particularly the case when accepting benefits, for example if the benefit is sent unsolicited by mail to the employee, if the employee cannot immediately assess the value of the benefit when accepting it or if the benefit is part of a formal occasion and refusing to accept it would be inappropriate for reasons of politeness. In such cases, the employee must obtain approval afterwards without delay.

If a gift or invitation cannot be accepted, our employees have to reject politely, but determinedly.

If the benefit was already accepted but approval is not granted or the benefit is one that is prohibited without exception, the employee must immediately return the benefit to the person offering it.

If it is not possible to refuse to accept a benefit or return an accepted benefit for reasons of politeness or for other reasons in individual cases, the employee must inform the OLH legal department. The OLH legal department will then review the individual case and decide whether the benefit can be retained or used. This decision is to be documented as appropriate.

Interactions with Healthcare Professionals may be subject to more stringent requirements and rules. Please see and comply with our ***Policy on Interactions with Healthcare Professionals (HCPs) and HCP Entities***.

## **Local Amendment for Brazil**

By way of **derogation of section 11.3** of the group-wide applicable Code of Conduct, the following applies if:

- The recipient of the gift or invitation is based in Brazil;
- The interaction with the recipient of the gift or invitation takes place in Brazil;
- The interaction with the recipient of the gift or invitation has any other connection to Brazil.

In case two or more local amendments are applicable, please apply the local amendment with the more stringent requirements and rules.

Please refer to the OLH legal department in case of questions or uncertainties regarding the applicability of this local amendment.

All other sections of group-wide applicable Code of Conduct remain unaffected.

### **Gifts and Invitations**

Our employees shall not, directly or indirectly, ask for any kind of benefits, such as favors, gifts or invitations (for example to meals or events). We also handle giving benefits to customers, business partners and other third parties very carefully.

Gifts and invitations to meals or other comparable amenities should not be offered to individuals, groups of individuals and/or entities or accepted by individuals/entities of OLH if their value, scope and timing may appear to influence our business, for example if the impression arises that a consideration is expected from the respective individuals, groups of individuals and/or entities. Only gifts and invitations of low value may be offered or accepted.

The value of gifts must be calculated based on the price that is commonly paid in the market where the recipient is based. For example, if a gift is purchased in Switzerland for CHF 20, offered to a business partner based in Brazil and the Brazilian market value is CHF 40, the market value of CHF 40 is relevant for the calculation. If OLH products are offered their value must be calculated based on the sales price.

The following thresholds apply in principal and are subject to the rules set out in this Code of Conduct. Deviating thresholds can be stipulated otherwise in another local amendment to this Code of Conduct for specific regions.

All thresholds apply to individuals. If gifts or invitations shall be offered to or shall be accepted by groups of individuals or entities, the threshold is calculated from the total amount divided by the number of individuals that receive gifts

and/or invitations. If gifts and/or invitations are not distributed equally, the actual value of the gifts and/or invitations per individual is applicable.

### For gifts and invitations offered to Public Officials and Public Entities

- **Gifts and invitations** with a value of more than BRL 100 per person are not permissible.
- **Gifts and invitations** with a value of up to BRL 15 per person do not require approval or documentation. In those cases the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.
- **Gifts and invitations** with a value of more than BRL 15 and up to BRL 30 per person do not require approval. However, they have to be documented in the Gifts and Invitations Form. In cases where approval is not necessary the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.
  - Please see and use the ***Gifts and Invitations Form***.
- **Gifts and invitations** with a value of more than BRL 30 and up to BRL 60 per person require approval from the Local Compliance Contact Person. Please contact the legal department if in doubt who the Compliance Contact Person in the respective local entity is.
  - Please see and use the ***Gifts and Invitations Form***.
- **Gifts and invitations** with a value of more than BRL 60 and up to BRL 100 per person require approval from the OLH legal department.
  - Please see and use the ***Gifts and Invitations Form***.

	Documentation: X Approval: X	Documentation: ✓ Approval: X	Documentation: ✓ Approval by Local Compliance Contact Person: ✓	Documentation: ✓ Approval by OLH Legal Department: ✓
Gift	Up to BRL 15 per person	BRL 15 up to 30 per person	BRL 30 up to 60 per person	BRL 60 up to 100 per person
Invitation	Up to BRL 15 per person	BRL 15 up to 30 per person	BRL 30 up to 60 per person	BRL 60 up to 100 per person

### For other gifts and invitations offered or accepted

- **Gifts** with a value of up to BRL 30 per person do not require approval or documentation. **Invitations** with a value of up to BRL 90 per person do not require approval or documentation. In those cases the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.

- **Gifts** with a value of more than BRL 30 and up to BRL 120 per person do not require approval. However, they have to be documented in the Gifts and Invitations Form. **Invitations** with a value of more than BRL 90 and up to BRL 200 per person do not require approval. In cases where approval is not necessary the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.  
→ Please see and use the ***Gifts and Invitations Form***.
- **Gifts** with a value of more than BRL 120 and up to BRL 250 and **invitations** with a value of more than BRL 200 and up to BRL 350 per person require approval from the Local Compliance Contact Person. Please contact the legal department if in doubt who the Compliance Contact Person in the respective local entity is.  
→ Please see and use the ***Gifts and Invitations Form***.
- **Gifts** with a value of more than BRL 250 and **invitations** with a value of more than BRL 350 per person require approval from the OLH legal department.  
→ Please see and use the ***Gifts and Invitations Form***.

	Documentation: X Approval: X	Documentation: ✓ Approval: X	Documentation: ✓ Approval by Local Compliance Contact Person: ✓	Documentation: ✓ Approval by OLH Legal Department: ✓
Gift	Up to BRL 30 per person	BRL 30 up to 120 per person	BRL 120 up to 250 per person	More than BRL 250 per person
Invitation	Up to BRL 90 per person	BRL 90 up to 200 per person	BRL 200 up to 350 per person	More than BRL 350 per person

The values indicated above are including beverages, tips and VAT.

The offering and accepting of a benefit must always be - even if below any thresholds mentioned above - within the boundaries of business appropriateness. The overall number of gifts and invitations offered to or accepted by one party always has to be reasonable. There has to be a determined business occasion and the gift or invitation has to be limited to a reasonable scope.

The following gifts and invitations are prohibited without exception:

- Gifts or invitations to Public Officials and Public Entities with a value of more than BRL 100;
- Cash or its equivalents;
- Gifts and invitations that the other party specifically requests;

- Gifts and invitations aimed at influencing someone's business decision or granted as gratitude or reward for business decisions.

The following applies to the documentation and approval process:

- The specific forms must be used.
- Approval should be obtained in advance and thus before offering or accepting the benefit.
- In individual cases, it may be difficult to obtain approval in advance. This is particularly the case when accepting benefits, for example if the benefit is sent unsolicited by mail to the employee, if the employee cannot immediately assess the value of the benefit when accepting it or if the benefit is part of a formal occasion and refusing to accept it would be inappropriate for reasons of politeness. In such cases, the employee must obtain approval afterwards without delay.

If a gift or invitation cannot be accepted, our employees have to reject politely, but determinedly.

If the benefit was already accepted but approval is not granted or the benefit is one that is prohibited without exception, the employee must immediately return the benefit to the person offering it.

If it is not possible to refuse to accept a benefit or return an accepted benefit for reasons of politeness or for other reasons in individual cases, the employee must inform the OLH legal department. The OLH legal department will then review the individual case and decide whether the benefit can be retained or used. This decision is to be documented as appropriate.

Interactions with Healthcare Professionals may be subject to more stringent requirements and rules. Please see and comply with our ***Policy on Interactions with Healthcare Professionals (HCPs) and HCP Entities***.

## **Local Amendment for Russia**

By way of **derogation of section 11.3** of the group-wide applicable Code of Conduct, the following applies if:

- The recipient of the gift or invitation is based in Russia;
- The interaction with the recipient of the gift or invitation takes place in Russia;
- The interaction with the recipient of the gift or invitation has any other connection to Russia.

In case two or more local amendments are applicable, please apply the local amendment with the more stringent requirements and rules.

Please refer to the OLH legal department in case of questions or uncertainties regarding the applicability of this local amendment.

All other sections of group-wide applicable Code of Conduct remain unaffected.

### **Gifts and Invitations**

Our employees shall not, directly or indirectly, ask for any kind of benefits, such as favors, gifts or invitations (for example to meals or events). We also handle giving benefits to customers, business partners and other third parties very carefully.

Gifts and invitations to meals or other comparable amenities should not be offered to individuals, groups of individuals and/or entities or accepted by individuals/entities of OLH if their value, scope and timing may appear to influence our business, for example if the impression arises that a consideration is expected from the respective individuals, groups of individuals and/or entities. Only gifts and invitations of low value may be offered or accepted.

The value of gifts must be calculated based on the price that is commonly paid in the market where the recipient is based. For example, if a gift is purchased in Switzerland for CHF 20, offered to a business partner based in Russia and the Russian market value is CHF 40, the market value of CHF 40 is relevant for the calculation. If OLH products are offered their value must be calculated based on the sales price.

The following thresholds apply in principal and are subject to the rules set out in this Code of Conduct. Deviating thresholds can be stipulated otherwise in another local amendment to this Code of Conduct for specific regions.

All thresholds apply to individuals. If gifts or invitations shall be offered to or shall be accepted by groups of individuals or entities, the threshold is calculated from the total amount divided by the number of individuals that receive gifts



and/or invitations. If gifts and/or invitations are not distributed equally, the actual value of the gifts and/or invitations per individual is applicable.

- **Gifts** and **invitations** with a value of more than RUB 3'000 per person are not permissible.
- **Gifts** with a value of up to RUB 600 per person do not require approval or documentation. **Invitations** with a value of up to RUB 1'200 per person do not require approval or documentation. In those cases the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.
- **Gifts** with a value of more than RUB 600 and up to RUB 1'500 per person do not require approval. However, they have to be documented in the Gifts and Invitations Form. **Invitations** with a value of more than RUB 1'200 and up to RUB 1'800 per person do not require approval. However they have to be documented in the Gifts and Invitations Form. In cases where approval is not necessary the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.
  - Please see and use the ***Gifts and Invitations Form***.
- **Gifts** with a value of more than RUB 1'500 and up to RUB 2'000 and **invitations** with a value of more than RUB 1'800 and up to RUB 2'200 per person require approval from the Local Compliance Contact Person. Please contact the legal department if in doubt who the Compliance Contact Person in the respective local entity is.
  - Please see and use the ***Gifts and Invitations Form***.
- **Gifts** with a value of more than RUB 2'000 and up to RUB 3'000 and **invitations** with a value of more than RUB 2'200 and up to RUB 3'000 per person require approval from the OLH legal department.
  - Please see and use the ***Gifts and Invitations Form***.

	Documentation: X Approval: X	Documentation: ✓ Approval: X	Documentation: ✓ Approval by Local Compliance Contact Person: ✓	Documentation: ✓ Approval by OLH Legal Department: ✓
Gift	Up to RUB 600 per person	RUB 600 up to 1'500 per person	RUB 1'500 up to 2'000 per person	RUB 2'000 up to 3'000 per person
Invitation	Up to RUB 1'200 per person	RUB 1'200 up to 1'800 per person	RUB 1'800 up to 2'200 per person	RUB 2'200 up to 3'000 per person

The values indicated above are including beverages, tips and VAT.

The offering and accepting of a benefit must always be - even if below any thresholds mentioned above - within the boundaries of business

appropriateness. The overall number of gifts and invitations offered to or accepted by one party always has to be reasonable. There has to be a determined business occasion and the gift or invitation always has to be limited to a reasonable scope.

The following gifts and invitations are prohibited without exception:

- Gifts or invitations with a value of more than RUB 3'000 per person;
- Cash or its equivalents;
- Gifts and invitations that the other party specifically requests;
- Gifts and invitations aimed at influencing someone's business decision or granted as gratitude or reward for business decisions.

The following applies to the documentation and approval process:

- The specific forms must be used.
- Approval should be obtained in advance and thus before offering or accepting the benefit.
- In individual cases, it may be difficult to obtain approval in advance. This is particularly the case when accepting benefits, for example if the benefit is sent unsolicited by mail to the employee, if the employee cannot immediately assess the value of the benefit when accepting it or if the benefit is part of a formal occasion and refusing to accept it would be inappropriate for reasons of politeness. In such cases, the employee must obtain approval afterwards without delay.

If a gift or invitation cannot be accepted, our employees have to reject politely, but determinedly.

If the benefit was already accepted but approval is not granted or the benefit is one that is prohibited without exception, the employee must immediately return the benefit to the person offering it.

If it is not possible to refuse to accept a benefit or return an accepted benefit for reasons of politeness or for other reasons in individual cases, the employee must inform the OLH legal department. The OLH legal department will then review the individual case and decide whether the benefit can be retained or used. This decision is to be documented as appropriate.

Interactions with Healthcare Professionals may be subject to more stringent requirements and rules. Please see and comply with our ***Policy on Interactions with Healthcare Professionals (HCPs) and HCP Entities***.

## **Local Amendment for Poland**

By way of **derogation of section 11.3** of the group-wide applicable Code of Conduct, the following applies if

- The recipient of the gift or invitation is based in Poland;
- The interaction with the recipient of the gift or invitation takes place in Poland;
- The interaction with the recipient of the gift or invitation has any other connection to Poland.

In case two or more local amendments are applicable, please apply the local amendment with the more stringent requirements and rules.

Please refer to the OLH legal department in case of questions or uncertainties regarding the applicability of this local amendment.

All other sections of group-wide applicable Code of Conduct remain unaffected.

### **Gifts and Invitations**

Our employees shall not, directly or indirectly, ask for any kind of benefits, such as favors, gifts or invitations (for example to meals or events). We also handle giving benefits to customers, business partners and other third parties very carefully.

Gifts and invitations to meals or other comparable amenities should not be offered to individuals, groups of individuals and/or entities or accepted by individuals/entities of OLH if their value, scope and timing may appear to influence our business, for example if the impression arises that a consideration is expected from the respective individuals, groups of individuals and/or entities. Only gifts and invitations of low value may be offered or accepted.

The value of gifts must be calculated based on the price that is commonly paid in the market where the recipient is based. For example, if a gift is purchased in Switzerland for CHF 20, offered to a business partner based in Poland and the Polish market value is CHF 40, the market value of CHF 40 is relevant for the calculation. If OLH products are offered their value must be calculated based on the sales price.

The following thresholds apply in principal and are subject to the rules set out in this Code of Conduct. Deviating thresholds can be stipulated otherwise in another local amendment to this Code of Conduct for specific regions.

All thresholds apply to individuals. If gifts or invitations shall be offered to or shall be accepted by groups of individuals or entities, the threshold is calculated from the total amount divided by the number of individuals that receive gifts

and/or invitations. If gifts and/or invitations are not distributed equally, the actual value of the gifts and/or invitations per individual is applicable.

- **Gifts** with a value of up to PLN 40 per person do not require approval or documentation. **Invitations** with a value of up to PLN 80 per person do not require approval or documentation. In those cases the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.
- **Gifts** with a value of more than PLN 40 and up to PLN 100 per person do not require approval. However, they have to be documented in the Gifts and Invitations Form. **Invitations** with a value of more than PLN 80 and up to PLN 100 per person do not require approval. However, they have to be documented in the Gifts and Invitations Form. In cases where approval is not necessary the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.
  - Please see and use the ***Gifts and Invitations Form***.
- **Gifts** and **invitations** with a value of more than PLN 100 and up to PLN 200 per person require approval from the Local Compliance Contact Person. Please contact the legal department if in doubt who the Compliance Contact Person in the respective local entity is.
  - Please see and use the ***Gifts and Invitations Form***.
- **Gifts** and **invitations** with a value of more than PLN 200 per person require approval from the OLH legal department.
  - Please see and use the ***Gifts and Invitations Form***.

	Documentation: X Approval: X	Documentation: ✓ Approval: X	Documentation: ✓ Approval by Local Compliance Contact Person: ✓	Documentation: ✓ Approval by OLH Legal Department: ✓
Gift	Up to PLN 40 per person	PLN 40 up to 100 per person	PLN 100 up to 200 per person	More than PLN 200 per person
Invitation	Up to PLN 80 per person	PLN 80 up to 100 per person	PLN 100 up to 200 per person	More than PLN 200 per person

The values indicated above are including beverages, tips and VAT.

The offering and accepting of a benefit must always be - even if below any thresholds mentioned above - within the boundaries of business appropriateness. The overall number of gifts and invitations offered to or accepted by one party always has to be reasonable. There has to be a determined business occasion and the gift or invitation has to be limited to a reasonable scope.

The following gifts and invitations are prohibited without exception:

- Cash or its equivalents;
- Gifts and invitations that the other party specifically requests;
- Gifts and invitations aimed at influencing someone's business decision or granted as gratitude or reward for business decisions.

The following applies to the documentation and approval process:

- The specific forms must be used.
- Approval should be obtained in advance and thus before offering or accepting the benefit.
- In individual cases, it may be difficult to obtain approval in advance. This is particularly the case when accepting benefits, for example if the benefit is sent unsolicited by mail to the employee, if the employee cannot immediately assess the value of the benefit when accepting it or if the benefit is part of a formal occasion and refusing to accept it would be inappropriate for reasons of politeness. In such cases, the employee must obtain approval afterwards without delay.

If a gift or invitation cannot be accepted, our employees have to reject politely, but determinedly.

If the benefit was already accepted but approval is not granted or the benefit is one that is prohibited without exception, the employee must immediately return the benefit to the person it.

If it is not possible to refuse to accept a benefit or return an accepted benefit for reasons of politeness or for other reasons in individual cases, the employee must inform the OLH legal department. The OLH legal department will then review the individual case and decide whether the benefit can be retained or used. This decision is to be documented as appropriate.

Interactions with Healthcare Professionals may be subject to more stringent requirements and rules. Please see and comply with our ***Policy on Interactions with Healthcare Professionals (HCPs) and HCP Entities***.

## **Local Amendment for India**

By way of **derogation of section 11.3** of the group-wide applicable Code of Conduct, the following applies if

- The recipient of the gift or invitation is based in India;
- The interaction with the recipient of the gift or invitation takes place in India;
- The interaction with the recipient of the gift or invitation has any other connection to India.

In case two or more local amendments are applicable, please apply the local amendment with the more stringent requirements and rules.

Please refer to the OLH legal department in case of questions or uncertainties regarding the applicability of this local amendment.

All other sections of group-wide applicable Code of Conduct remain unaffected.

### **Gifts and Invitations**

Our employees shall not, directly or indirectly, ask for any kind of benefits, such as favors, gifts or invitations (for example to meals or events). We also handle giving benefits to customers, business partners and other third parties very carefully.

Gifts and invitations to meals or other comparable amenities should not be offered to individuals, groups of individuals and/or entities or accepted by individuals/entities of OLH if their value, scope and timing may appear to influence our business, for example if the impression arises that a consideration is expected from the respective individuals, groups of individuals and/or entities. Only gifts and invitations of low value may be offered or accepted.

The value of gifts must be calculated based on the price that is commonly paid in the market where the recipient is based. For example, if a gift is purchased in Switzerland for CHF 20, offered to a business partner based in India and the Indian market value is CHF 40, the market value of CHF 40 is relevant for the calculation. If OLH products are offered their value must be calculated based on the sales price.

The following thresholds apply in principal and are subject to the rules set out in this Code of Conduct. Deviating thresholds can be stipulated otherwise in another local amendment to this Code of Conduct for specific regions.

All thresholds apply to individuals. If gifts or invitations shall be offered to or accepted by groups of individuals or entities, the threshold is calculated from the total amount divided by the number of individuals that receive gifts and/or

invitations. If gifts and/or invitations are not distributed equally, the actual value of the gifts and/or invitations per individual is applicable.

### **For gifts and invitations offered to Public Officials and Public Entities**

- **Gifts** and **invitations** to Public Officials and Public Entities, regardless the amount, are forbidden. In particular (but not limited to), Gifts and invitations offered to a Public Official and Public Entity in violation of the Prevention of Corruption Act, 1988 are forbidden.

### **For other gifts and invitations offered or accepted**

- **Gifts** with a value of up to INR 600 per person do not require approval or documentation. **Invitations** with a value of up to INR 2'000 per person do not require approval or documentation. In those cases the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.
- **Gifts** with a value of more than INR 600 and up to INR 2'700 do not require approval. However, they have to be documented in the Gifts and Invitations Form. **Invitations** with a value of more than INR 2'000 and up to INR 4'000 per person do not require approval. However, they have to be documented in the Gifts and Invitations Form. In cases where approval is not necessary the decision to offer or accept lies with the employee. The employee shall carefully consider such actions and in case of doubt seek guidance of the legal department.  
→ Please see and use the ***Gifts and Invitations Form***.
- **Gifts** with a value of more than INR 2'700 and up to INR 5'000 and **invitations** with a value of more than INR 4'000 and up to INR 7'000 per person require approval from the Local Compliance Contact Person. Please contact the legal department if in doubt who the Compliance Contact Person in the respective local entity is.  
→ Please see and use the ***Gifts and Invitations Form***.
- **Gifts** with a value of more than INR 5'000 and **invitations** with a value of more than INR 7'000 per person require approval from the OLH legal department.  
→ Please see and use the ***Gifts and Invitations Form***.

	Documentation: X Approval: X	Documentation: ✓ Approval: X	Documentation: ✓ Approval by Local Compliance Contact Person: ✓	Documentation: ✓ Approval by OLH Legal Department: ✓
Gift	Up to INR 600 per person	INR 600 up to 2'700 per person	INR 2'700 up to 5'000 per person	More than INR 5'000 per person
Invitation	Up to INR 2'000 per person	INR 2'000 up to 4'000 per person	INR 4'000 up to 7'000 per person	More than INR 7'000 per person

The values indicated above are including beverages, tips and VAT.

The offering and accepting of a benefit must always be - even if below any thresholds mentioned above - within the boundaries of business appropriateness. The overall number of gifts and invitations offered to or accepted by one party always has to be reasonable. There has to be a determined business occasion and the gift or invitation always has to be limited to a reasonable scope.

The following gifts and invitations are prohibited without exception:

- Gifts and invitations to Public Officials and Public Entities;
- Cash or its equivalents;
- Gifts and invitations that the other party specifically requests;
- Gifts and invitations aimed at influencing someone's business decision or granted as gratitude or reward for business decisions.

The following applies to the documentation and approval process:

- The specific forms must be used.
- Approval should be obtained in advance and thus before offering or accepting the benefit.
- In individual cases, it may be difficult to obtain approval in advance. This is particularly the case when accepting benefits, for example if the benefit is sent unsolicited by mail to the employee, if the employee cannot immediately assess the value of the benefit when accepting it or if the benefit is part of a formal occasion and refusing to accept it would be inappropriate for reasons of politeness. In such cases, the employee must obtain approval afterwards without delay.

If a gift or invitation cannot be accepted, our employees have to reject politely, but determinedly.



If the benefit was already accepted but approval is not granted or the benefit is one that is prohibited without exception, the employee must immediately return the benefit to the person offering it.

If it is not possible to refuse to accept a benefit or return an accepted benefit for reasons of politeness or for other reasons in individual cases, the employee must inform the OLH legal department. The OLH legal department will then review the individual case and decide whether the benefit can be retained or used. This decision is to be documented as appropriate.

Interactions with Healthcare Professionals may be subject to more stringent requirements and rules. Please see and comply with our ***Policy on Interactions with Healthcare Professionals (HCPs) and HCP Entities***.

## Revision History

Revision	Effective Date	Description of Revision
1.0	01.03.2016	New Policy
1.1	15.09.2016	Minor Changes
2.0	01.10.2017	Major Changes
2.1	01.07.2018	Minor Changes
2.2	01.01.2022	Minor Changes

## Approval

Department	Name	Signature	Date
OLH legal department (Head Group Compliance)	Markus Kern		