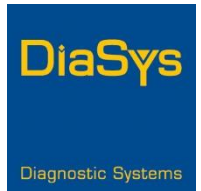


# DiaSys Compliance Politics



The corporate culture and awareness of social responsibility have induced DiaSys to outline those regulations, which apply to the company, in a Compliance Management System according to ISO 37301, and to integrate it alongside the existing quality management system.

## **Management measures**

The commitment to compliance is clearly communicated by the management. To this end, a declaration of intent to establish a compliance management system and a code of conduct have been published. An independent compliance function and a compliance committee have been set up to advise and support the management and to establish, improve and further develop the compliance management system.

## **Compliance-specific framework**

The implementation of specific operating procedures, guidelines and the provision of legal requirements in the company-specific legal register, clearly and transparently define compliance rules at DiaSys. DiaSys complies with both legal requirements and self-defined binding obligations. These are regularly reviewed and updated.

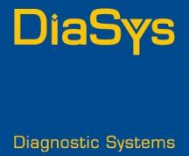
## **Systematic training**

To maintain the effectiveness of the compliance management system, all employees must be familiar with the relevant legal requirements as well as with internal compliance documents. The aim is for all employees to know and adhere to the DiaSys compliance rules. The basis for this is compliance training, which is offered as on-site or online training. Training on topics of fundamental relevance is considered as mandatory for every employee. Further training on specific topics is assigned according to job and responsibility profiles. The training demand is regularly reviewed.

## **Reporting of irregular behavior**

DiaSys encourages employees to report possible irregularities and infringements against law, internal regulations or guidelines. A whistleblower system has been set up for this, which allows confidential reporting via various channels. The Compliance Officer follows up on indications of violations in any event. No retaliation or negative consequences need be feared for reporting, even if the report proves to be unfounded or incorrect but was made in good faith or on basis of reasonable suspicion.

# DiaSys Compliance Politics



## Consequence of non-compliant behavior

Compliance violations may result in serious consequences such as warnings, termination, claims for damages, lawsuits, penalties or image loss for employees or the company. The DiaSys principle is zero tolerance regarding compliance violations. Where they do occur, the company acts consistently.

## Scope of Compliance Management

Following the establishment of the Compliance Management for DiaSys Diagnostic Systems GmbH, the system will be expanded within the Group.<sup>1</sup>

Version	by	Date	Reason for change
1	M. Pumplun	2022-08-25	Initial creation
2	M. Pumplun	2023-12-18	Code of Conduct established, corresponding footnote removed Whistleblower system established, corresponding footnote removed

Holzheim, 2023-12-18

Dr. Günther Gorka  
Managing Director

Dr. Jan Gorka  
Managing Director

Peter Zöller  
Managing Director

<sup>1</sup> Further expansion takes place according to an internal project plan