

# CODE OF CONDUCT

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## 1 Foreword by the Management

DiaSys Diagnostic Systems is a leading specialist in the development and manufacturing of diagnostic system solutions of highest quality, trusted by customers in more than 140 countries for over 30 years. Our product portfolio comprises more than 90 clinical chemistry and immunoturbidimetric reagents for routine and special diagnostics including suitable calibrators and controls. The DiaSys instrumentation product range covers automated clinical chemistry analyzers, semi-automated analyzers and POC instruments for patient-near testing.

Since its foundation in 1991 by Dr. Günther Gorka, Rolf Greiner and Dr. Manfred Probst, the name DiaSys has stood not only for high-quality reagents and systems with high application safety that are extremely reliable, environmentally compatible and sustainable, but also for the values of an owner-managed family business.

Compliance with the law, adherence to internal guidelines and respect for fundamental ethical values are the foundation on which our economic success is based. We are aware of our social, ecological and societal responsibility towards our employees, business partners, the community and the environment, through which we want to maintain the trust of our employees and business partners and contribute to the sustainable development of our company and the community.

This Code of Conduct summarizes the most important principles of our corporate actions. It shows our employees the guidelines for their daily work in dealing with colleagues, business partners and competitors and supports them in dealing with legal and ethical issues. It is an essential duty for every employee to read and understand this Code of Conduct and to actively implement it in their daily work. We are jointly responsible for acting in compliance with the rules and with integrity.

Holzheim, December 2025



Dr. Günther Gorka



Dr. Jan Gorka



Peter Zöller



Min Zheng

## 2 Statements of Principles



### 2.1 Introduction

Integrity, compliance with laws and responsibility towards people and the environment determine our entrepreneurial actions. This Code of Conduct summarizes the most important principles for acting in compliance with the law and regulations as well as for morally and ethically impeccable behavior, both in business transactions and in dealings with one another.

The preservation of an intact environment for our future generations is a special concern, which is why the Code of Conduct is also intended to be the basis for sustainable development of our company. It provides guidance in our daily work and is intended to support and promote correct, righteous and responsible conduct. The aim of this Code of Conduct is to gain and maintain the trust of all those who are associated with us in any way.

The statements in this Code of Conduct represent a minimum standard. Stricter regulations, standards or further requirements are not restricted by this Code of Conduct and are also applicable.

### 2.2 Scope of the Code of Conduct

This Code of Conduct is binding for all employees of the entire DiaSys Group (majority shareholdings), hereinafter referred to as DiaSys. It is the responsibility of each manager to inform the employees assigned to him or her about the validity and contents of this Code of Conduct in a comprehensible manner and to urge them to comply with all rules unconditionally. In addition, DiaSys will help its employees to implement this Code through training courses. Implementation at the subsidiaries is carried out individually according to local conditions.

As disregard of the Code of Conduct can lead to major economic damage and considerable loss of reputation and thus jeopardize the sustainable development of the company, the management will not tolerate any violation of the principles of this Code. Each employee must take responsibility for compliance with all laws and regulations affecting him or her and, in the event of a culpable violation, must expect disciplinary action and the assertion of claims for damages.

The provisions of this Code are substantiated and supplemented by internal processes and guidelines on selected topics. All processes and guidelines are in line with this Code, which represents an internal code of conduct. The current version of the Code of Conduct is available on our website at <https://www.diasys-diagnostics.com/de/service/qm-regulatorisches/> and in DiaWorld at <https://diasys.sharepoint.com/sites/QMRACompliance>.

## 2.3 Respect for human rights and environmental obligations

DiaSys is committed to respecting human rights and environmental obligations within the supply chain and considers the protection of human rights as a central element. The first starting point for this is our own business unit. We expect our managers and our employees, as representatives of our company, to act as role models.

To this end, we expect our employees to implement applicable law in the performance of their work, to respect internationally recognized human rights and environmental obligations, and to take care to prevent human rights violations and environmental pollution. This includes the following principles in particular:

### Child labor, forced labor and slavery

We condemn all forms of child labor, forced labor and slavery.

### Occupational health and safety

We undertake to comply with the occupational health and safety obligations applicable under the law of the place of employment and thus to prevent the risk of accidents at work or work-related health hazards.

### Freedom of association

We reject any disregard for freedom of association. All of our leaders and employees, regardless of their position in our company, are obligated to respect the right of our employees to associate or join unions, and not to use the formation, joining or membership of a union as a reason for unjust discrimination or retaliation. In addition, all of our managers and employees respect the right of unions to operate freely and in accordance with the law of the place of employment.

### Discrimination

All people enjoy equal treatment. We reject any form of unequal treatment, for example on the basis of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, unless this is justified by the requirements of the employment. Unequal treatment includes, in particular, the payment of unequal remuneration for work of equal value.

### Adequate wages

We expect to be paid a reasonable wage.

### Environmental damage

We expect our managers and employees to prevent any kind of environmental damage. This includes causing harmful land degradation, water and air pollution, harmful noise emissions, and excessive water consumption.

## 3 Behavior in business transactions



### 3.1 Principle of fair competition, prohibition of cartels

Free, unrestricted and fair competition is the fundamental principle of the market economy. We support all efforts to promote these principles. It is our business policy to focus exclusively on performance, customer orientation and the quality of our innovative products. We do not tolerate any behavior on the part of our employees that contravenes national and international competition rules and antitrust regulations.

Any anti-competitive or antitrust-related conduct must be refrained from. Our Antitrust Policy covers the types of activities that, if carried out improperly, could constitute a violation of antitrust and competition laws or regulations, and which are to be avoided.

### 3.2 Prohibition of corruption

The promotion of our products is determined by innovation, quality and price. Any form of corruption is prohibited. DiaSys does not tolerate any unlawful offering or granting of advantages to business partners, public officials or other persons in connection with the awarding, approval and execution of contracts. Due to the narrow scope for gifts and invitations to a public official, it must always be ensured that these are permissible under the respective legal/regulatory provisions.

Furthermore, in this context, as a member company of the VDPH and MedTech Europe, we undertake to comply with the principles of the VDPH Code for In Vitro Diagnostics and Medical Devices and the MTE Code of Ethical Business Conduct throughout Europe when providing financial and material support to healthcare professionals and institutions.

For further details, please refer to the DiaSys Guideline Grants and the processes Granting and Accepting Grants and Ethical Business Conduct for the Financial and Material Support of Healthcare Professionals and Institutions.

### 3.3 Money laundering prevention

As a trader of goods, we are obliged to implement the Money Laundering Act. In order to prevent us from being misused to commit criminal acts in order to introduce illegally acquired profits from serious crimes into the legal economic cycle, we have taken appropriate precautions and established processes regarding the specifications of goods traders, implementation of due diligence obligations, recording and storage obligations and suspicious activity reporting procedures so that we can react in accordance with the law in moments of suspicion.

### 3.4 Regulation of donations and sponsoring

DiaSys supports cultural, social, scientific, technical and ecological institutions, organizations and projects in our region through donations and sponsoring. These voluntary contributions must not give the appearance of exerting influence or be likely to damage the reputation of DiaSys or its employees.

Donations and sponsorship benefits may only be granted if they do not contradict any management requirements or compliance rules that have been put in place. The approval process and relevant amount limits are governed by the Donations and Sponsorship process.

### 3.5 Compliance with export control regulations and customs regulations

Compliance with nationally and internationally applicable trade regulations and export restrictions is a priority for DiaSys. Therefore, all national and international regulations and embargoes restricting or prohibiting the import, export or domestic trade of goods must be complied with. The same applies to export control regulations, customs regulations and the resulting licensing procedures. Further details are regulated in the export control processes of DiaSys.

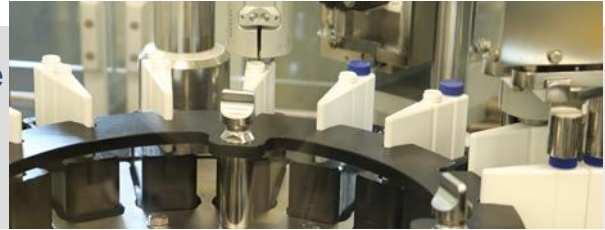
### 3.6 Selection of business partners

Suppliers are selected carefully and according to objective criteria on the basis of the Supplier Selection and Approval process. An evaluation of all business partners, such as suppliers, distributors and service providers, is carried out through business partner due diligence before and during a business relationship, which is regulated in the processes Monitoring and Evaluation of Suppliers and Business Partner Review.

### 3.7 Documentation and reporting

All compliance services to be documented according to internal or external regulations are recorded within a designated system and comply with the documentation requirements. Documentation is retained in accordance with legal as well as internal requirements and deadlines.

## 4 Employees and leadership culture



### 4.1 Leadership culture

DiaSys stands by its social responsibility towards its employees. Therefore, we promote the professional and personal development of our employees, provide a safe working environment, fair working conditions and invest in the qualification of our employees. We trust in the loyalty of our employees and expect them to behave with legal and ethical integrity and to align their actions with the principles of this Code of Conduct.

### 4.2 Fair working conditions and occupational safety

We ensure fair treatment of our employees, do not tolerate discrimination and harassment, offer appropriate remuneration and comply with labor laws. We respect lawful representation of our employees' interests. The health of our employees and safety at the workplace are of great importance to us. We comply with all regulations on health protection, occupational safety and fire protection. We strive to continuously improve the health and safety of our employees in their working environment and to avoid hazards.

### 4.3 Confidentiality, data protection and information security

DiaSys is committed to the security and protection of sensitive and personal data. Every employee of DiaSys is subject to the duty of confidentiality with regard to the internal affairs of DiaSys towards third parties, unless they have been lawfully published or made accessible to third parties beforehand. The duties are part of the employment contracts. In order to protect the privacy of the persons concerned, each employee is also obliged to comply with the statutory and internal regulations on the handling of personal data. In this regard, DiaSys has established a privacy policy regarding the collection, processing and use of personal data. Business data is secured and protected against unauthorized access by third parties using high technical and organizational security standards.

### 4.4 Careful handling of company property

DiaSys expects all employees to handle all tangible and intangible assets of the company with care. In addition to real estate and business equipment, this also includes operating resources, products, information systems, software and industrial property rights (e.g. patents). Damage must be reported. The private use and removal of company property are prohibited, unless express permission has been granted.

## 5 Implementing the Code of Conduct



### 5.1 Compliance organization

To support compliance with laws and self-imposed guidelines, DiaSys has implemented a compliance organization. It is managed by a Compliance Committee, whose members include two compliance officers and two managing directors. Compliance officers are assigned to all business areas. The compliance officers are responsible for setting up and implementing our compliance management system and are permanent contacts for all compliance issues.

The principles and values laid down in this Code of Conduct form the basis for the continued economically, socially and ecologically sustainable development of DiaSys. They reflect our compliance management system, serve to minimize and control business risks and concretize DiaSys' responsibility for people and the environment. DiaSys therefore expects all employees to strictly implement and adhere to this Code.

Responsibility for knowledge of and compliance with this Code, for integrity in business conduct, and for legal and regulatory compliance rests with each and every employee of DiaSys. Violations can endanger DiaSys. Therefore, they are taken very seriously by the management and sanctioned accordingly.

### 5.2 Culture of open debate

DiaSys maintains a culture of open discussion. Every employee can report violations of this Code of Conduct to the Compliance Officer without incurring any disadvantages. In addition, a whistleblower system has been established in which violations of the Code of Conduct can also be reported anonymously. If violations of this Code of Conduct are identified, we expressly encourage and support the reporting of such violations to the Compliance Officer.

### 5.3 Contact with the compliance organization

Information, questions and suggestions on compliance topics can be directed to the compliance officers at the following address:

Stefanie Giesener  
Direct dial: +49 6432 9146-181  
E-Mail: [stefanie.giesener@diasys.de](mailto:stefanie.giesener@diasys.de)

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