

CODE OF CONDUCT

English



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STATEMENT FROM THE CEO



Dear colleagues,

As the European leader in pharmaceutical wholesale, pharmacy retail and services for the pharmaceutical industry, the PHOENIX group plays a vital role in providing access to medicines and health products to millions of people. Our operations are grounded in high standards such as Good Distribution Practice and compliance with relevant legal regulations. Guided by our mission, “We deliver health”, we rely on the dedication and integrity of every one of you.

This Code of Conduct (CoC) describes our common understanding of principles and rules at the PHOENIX group. It is intended to provide practical orientation. You do not need to have an answer in every situation, but need to be open to ask for help. Thus, the Code of Conduct serves as a compass to help navigate the

complexities of our industry and aligns our daily work with the values and expectations which define who we are as a company. I consider every employee of the PHOENIX group responsible to act in accordance with the CoC. By doing so, each and every one of us helps to protect our reputation, to promote the trust of our partners and customers, and to contribute to the long-term success of our organisation.

Thank you for taking the time to stay vigilant and act responsibly.

A handwritten signature in green ink, which appears to be 'S. Seidel'.

Sven Seidel

CEO PHOENIX group

FOUNDATION

The PHOENIX group is the European leader in pharmaceutical wholesale, pharmacy retail and services for the pharmaceutical industry. With a unique workforce and geographical coverage throughout Europe, we are making a vital contribution to comprehensive healthcare. Our good reputation and future business success depend on our attitude and the way in which the company is led.



OUR PRINCIPLES

We aim at being the best – but we do so with integrity and responsibility. We at the PHOENIX group seek to comply with all laws, regulations and guidance principles that are applicable within the European Union and each country where we operate. Legislative obligations, responsibilities and values are part of several policies and statements. Beyond compliance, all employees are expected to carry out their responsibilities in a professional manner, protecting the reputation of the PHOENIX group. As an employee, you should always treat customers, suppliers and fellow employees with respect, honesty and integrity.

OUR MISSION



This mission serves as the foundation of our commitment to improving the well-being of individuals and communities by ensuring accessible, high-quality healthcare products and services.

OUR VISION

We are the partner of choice for simple and direct access to healthcare products and services across Europe.

We envision ourselves as the leading provider, enabling seamless access to essential healthcare solutions, bridging gaps between demand and delivery, and fostering trust in our capabilities.

Employee and leadership principles tied to our mission and vision are fundamental for guiding behaviour, shaping our corporate culture and achieving sustainable growth. They ensure that everyone is moving in the same direction, contributing not only to the success of the organisation and its performance but also to a more engaged and purposeful work environment.



DEFINITIONS

Unless the context indicates otherwise, the following terms in this Code of Conduct are defined as follows:

PHOENIX group:

PHOENIX Pharma SE and all of its direct and indirect subsidiaries.

Employees:

All persons who have a direct employment contract with any entity of the PHOENIX group – including interns, working students, managers, directors and Executive Board members.

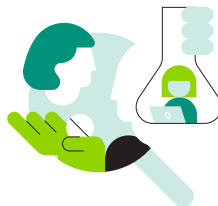


In order to ensure our mission and vision are anchored in the way we work, the PHOENIX group has set up the framework wePHOENIX – which consists of six key commitments. These outline expectations of how we work together, ensuring that we consistently create meaningful, positive impacts for our customers and the communities we serve.

#WEPHOENIX COMMITMENTS

We focus on the **customer**

We operate in markets with diverse customers and serve all their current and future needs with our tailored portfolio of products and services.



We operate **efficiently**

We strive for excellence in everything we do, continuously optimise our operations to get better every day and use resources efficiently to become more sustainable.



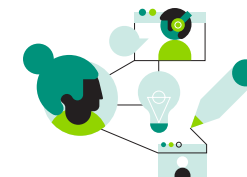
We think **forward**

We drive innovation and play an active role in the digital transformation of the healthcare sector in Europe to improve our customers' lives.



We embrace **collaboration**

We support each other by sharing knowledge, competences and best practices across the entire the company.



We create **value**

We are a family-owned company and pursue a long-term strategy, ensuring that our growth continues to create value for generations to come.



We are **one team**

We are bound together by our shared vision for the company, welcome anyone who is willing to make this vision a reality and foster their personal and professional development in an inclusive environment.



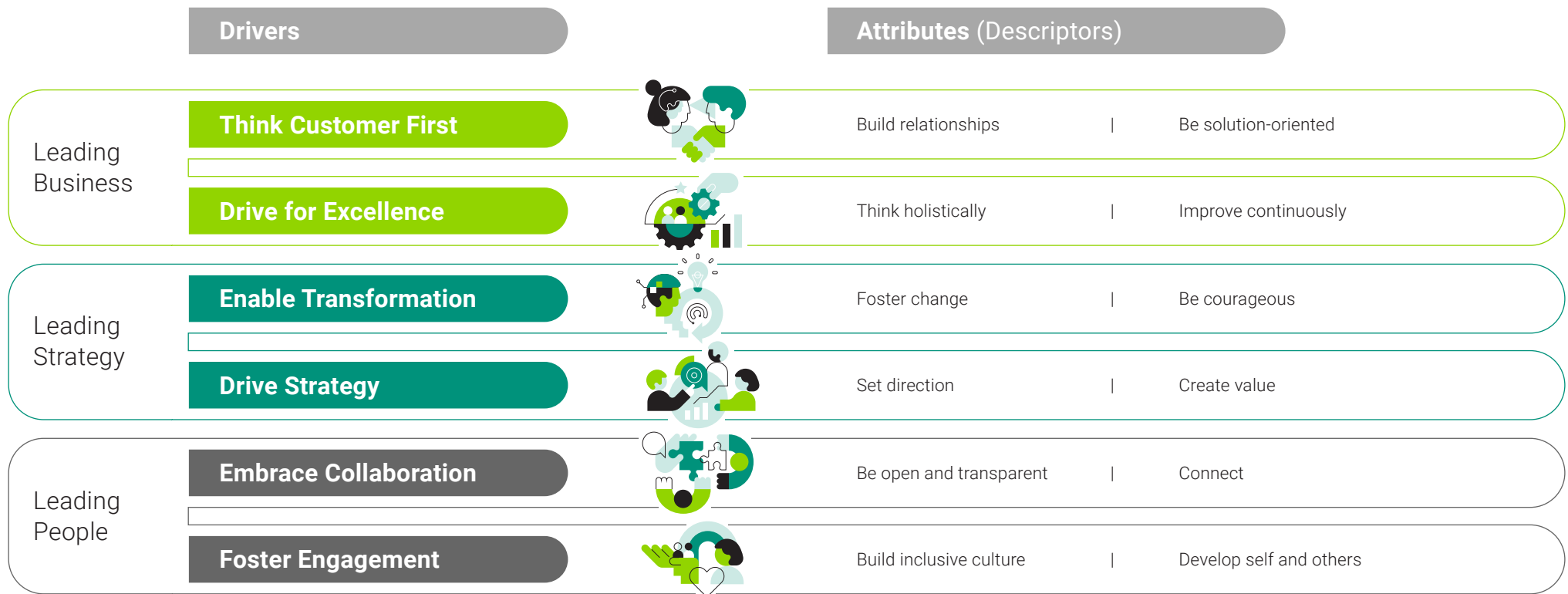
How to proceed in unclear situations



How to raise a concern

What can employees expect from their leaders? The mandatory leadership framework iPHOENIX embodies principles and behaviours to hold our leaders accountable. It is the counterpart to wePHOENIX and serves as a transparent benchmark for the development of our leaders as well as the execution of our mission and vision.

#IPHOENIX PRINCIPLES

[How to proceed in unclear situations](#)[How to raise a concern](#)

HOW TO PROCEED IN UNCLEAR SITUATIONS

All employees regardless of their position in the company are required to follow this Code of Conduct. To this end, the PHOENIX group regularly informs employees of its content and significance. Nevertheless, communication and business activities or situations can be complex, unclear or even misleading.

WHEN IN DOUBT, ASK YOURSELF:

Would I feel comfortable if others knew about my actions?

Does this action or fact feel right to me?

Did I check relevant company rules and guidelines?

If you are not sure how to assess or handle a particular situation, seek guidance and support before you take any further steps.



For any work-related issues contact your supervisor or manager at your location who is relevant to the situation in question.

If you have any questions, regardless of your specialist area, please contact:

Corporate Compliance

✉ compliance@phoenixgroup.eu

Local Sustainability Managers and Corporate Sustainability

✉ sustainability@phoenixgroup.eu

Country Communication Managers or Corporate Communications

✉ media@phoenixgroup.eu

Quality Management

✉ corporatequalitymanagement@phoenixgroup.eu

Corporate Security

✉ corporate-security-general@phoenixgroup.eu

Local Data Protection Officers or Corporate Data Protection

✉ dataprotection@phoenixgroup.eu

Local tax experts or Corporate Tax

✉ grouptaxes@phoenixgroup.eu

Information Security

📍 Local Service Desk



How to proceed in unclear situations



How to raise a concern

HOW TO RAISE A CONCERN

DOING THE RIGHT THING MAY TAKE COURAGE

The PHOENIX group is aware that violations of legislation or its values may occur despite training offerings or due diligence processes. But one bad decision or act of misconduct can have far-reaching consequences leading to disciplinary actions, fines, or claims for damages – for an employee personally and/or the group. All employees are expected to uphold our zero-tolerance policy.

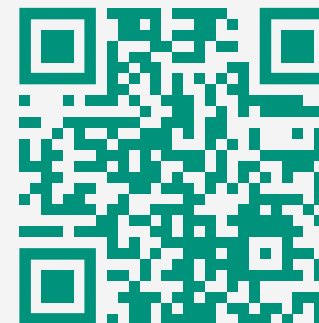
WE ARE COMMITTED TO PROTECTING ANYONE WHO REPORTS VIOLATIONS

It is important to raise concerns in good time regarding any misconduct, or any breach of laws or of our Code of Conduct. Every report is taken seriously and an internal investigation will follow if necessary.

Reports can be submitted confidentially, in any of our languages, and – if desired – anonymously. This is done with the full support of the PHOENIX group's Executive Board and is coordinated throughout the group by means of a uniform Compliance Management System. By making sure that observations and incidents are properly addressed, we can protect the PHOENIX group and create a safe working environment.

» phoenixgroup.integrityline.io

You can use our **Integrity Platform** for filing a report (anonymously), but you are also welcome to use any other channel:



Reports can be made to your line manager, your Local Compliance Manager or to **Corporate Compliance**
✉ compliance@phoenixgroup.eu



PHOENIX Pharma SE
Corporate Compliance
Pfungstweidstrasse 10–12
68199 Mannheim, Germany

Mail should be marked as "confidential".



Corporate Compliance
+49 621 / 8505 8519

Do you want to know more?



You can find more information in the
» **Compliance Principles and Reporting & Investigations Guideline** and » **Rules of Procedure** (our detailed complaints procedure for reporting suspected cases).



How to proceed in unclear situations



How to raise a concern

WORKPLACE ETHICS

The PHOENIX group fosters a positive, respectful and productive working environment. All employees receive the same opportunities at all stages of the employment relationship – regardless of gender, age, religion, skin colour, sexual orientation, social, ethnic or national origin, disability or other attributes.



HUMAN RIGHTS, FAIRNESS AND RESPECT

WE VALUE EVERYONE AND RESPECT HUMAN RIGHTS

Human rights are inherent to every individual, and protecting them helps ensure that people are treated with dignity, free from discrimination, harassment or harm. By prioritizing human rights, we can not only create a respectful and safer environment but also mitigate the risk of legal consequences and reputational damage. Upholding human rights fosters responsible business practices that contribute to long-term success and strengthen trust with customers, employees and partners.

Treating each other with fairness and respect is fundamental to the way we do business. We take a stand for human rights and the well-being of people throughout our workplaces, business operations and supply chain. And we actively oppose modern slavery and human trafficking, including forced and child labour, and any kind of discrimination or intimidation. The PHOENIX group ensures fair employment conditions and compliance with applicable labour laws. Our human rights risk management approach is guided by internationally agreed standards such as the United Nations' Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights as well as the basic principles of the International Labour Organization (ILO), which provide us with important guidance in this regard.

GUIDING QUESTIONS

Would I feel comfortable working under the same conditions as colleagues or employees of suppliers?

Am I aware of and do I follow the PHOENIX group due diligence processes to identify and mitigate risks related to our own business activities or those of suppliers?

Am I open to learning and trying new ways to support human rights and protect potentially affected groups?



COOPERATION WITH EMPLOYEE REPRESENTATIVES

We are proactive in working towards a fair balance of interests. The objective is to preserve long-term workable cooperation that is constructive, even in controversial disputes. The PHOENIX group is committed to developing cooperation with employees' and trade union representatives. The company respects the right of its employees to form representations, find collective agreements on working conditions and exercise their right to strike in accordance with applicable laws.



Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [Policy Statement on Human Rights](#) and the » [Supplier Code of Conduct Guideline](#).

The relevant area in CONET is » [Governance](#).

If you have questions or need support, contact your » [Local Human Rights Officer](#) or ✉ sustainability@phoenixgroup.eu



How to proceed in unclear situations



How to raise a concern

PEOPLE AND CULTURE

WE PROMOTE EQUAL OPPORTUNITIES AND SOCIAL VARIETY

Equal opportunities, better support of marginalised and disadvantaged groups and a culture of advocacy can strengthen solidarity and have a positive impact on employee motivation and the reputation of our company. Conversely, a poor working atmosphere can lead to finding fewer suitable employees and demotivating current employees.

The PHOENIX group is guided by the belief in equal opportunity for all, and is convinced that teams with a variety of backgrounds and capabilities deliver better results. This commitment is rooted in the understanding that a variety of perspectives and experiences enrich decision-making processes and drive innovation. The goal is to promote social variety among employees and managers by creating an environment where everyone feels valued and empowered to contribute their unique talents.

Appointments, promotions and remuneration should be based on an individual's qualifications, professional aptitude and performance. We therefore make efforts to eliminate bias in processes and to provide fair access to opportunities for all employees. In doing so, the PHOENIX group not only enhances organisational effectiveness but also upholds its responsibility to contribute positively to society.

Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our local HR guidelines.

If you have any questions or need support, contact your line manager.



GUIDING QUESTIONS

Is my behaviour respectful and supportive of all individuals, regardless of their background, identity or perspective?

How do I recognise and address my own biases to ensure they do not affect my decisions and interactions with others?



How do I ensure that I am actively listening to and understanding perspectives that differ from my own?



How to proceed in unclear situations



How to raise a concern

HEALTH AND SAFETY

WE CARE ABOUT THE HEALTH AND SAFETY OF EACH OF US

Healthy and safe operations are essential for preventing illness and injury, while also promoting overall well-being in the workplace. By actively supporting the physical and mental health of employees, the PHOENIX group can enhance satisfaction and loyalty while also fostering increased productivity and engagement, contributing to our long-term success.

The PHOENIX group is committed to protecting the health and safety of all employees, visitors, and others affected by our operations. Consumption of drugs and alcohol at work is prohibited. The moderate use of alcohol is allowed on special occasions – such as events – if it is specifically authorised in advance by the management of the respective countries.



Do you want to know more?

More information can be found in our local environment, health and safety (EHS) guidelines.

If you have any questions or need support, contact your line manager or country H&S manager.

GUIDING QUESTIONS

Am I following all safety protocols and procedures to ensure my own well-being and that of others around me?

Have I received proper training, and do I understand how to handle equipment, chemicals or tasks safely?

Is my behaviour or decision-making putting anyone's health or safety at risk, even unintentionally?

Am I aware of and prepared for emergency procedures in case of an accident or health-related incident?



How to proceed in unclear situations



How to raise a concern

INFORMATION SECURITY

WE PROTECT OUR INFORMATION AT ALL TIMES

Information and the supporting processes, systems and networks are business assets that are important to the PHOENIX group, and consequently need to be protected. This is especially important in our increasingly interconnected business environment: information is exposed to a growing number and a wider variety of threats and vulnerabilities.

The key components of information security are confidentiality, integrity and availability. We achieve information security through controls, including guidelines, processes, procedures, organisational structures as well as software and hardware functions. But at the core of all this is safety awareness among employees. We provide authentication for any access to security-sensitive data, ensure logging off and use encryption when transferring security-sensitive data outside the company boundaries. The obligation to protect confidential, content-sensitive information relating to the PHOENIX group continues even after an employee leaves the organisation.

Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [User Guideline](#).

If you have any questions or need support, first contact your local Service Desk. Additionally, you can find a list of contact persons (Information Security Officers, ISOs) for each country in » [CONET](#).



GUIDING QUESTIONS

Are my passwords and access controls strong enough to protect against potential security threats?

Have I shared any confidential information with unauthorised individuals, either intentionally or unintentionally?

Am I taking appropriate precautions when using company devices or accessing company data, both on- and off-site?



PROTECTING OUR ASSETS

Assets can be tangible or intangible. An intangible asset cannot be seen or touched – such as brand recognition or reputation. Tangible assets are physical and can be seen, touched or felt – such as buildings, notebooks or software.

When it comes to intangible assets, we protect our intellectual property to the extent reasonable and possible, especially through copyrights, patents, and trademarks and expect our own rights to be treated in the same way. Inventions that are created during employment at the PHOENIX group belong to the company. All relevant legal provisions and obligations must always be observed.



E-MAIL, COMPUTERS AND NETWORK SECURITY

Our IT systems should only be used for private purposes to a very limited extent and in compliance with the appropriate IT guidelines that are in place within each individual country. Employees are not allowed to download or distribute any type of offensive communication or content via IT and communication systems provided by the PHOENIX group (such as mobile phones). This includes, for example, pornographic, obscene, vulgar, politically radical, criminal or otherwise discriminatory or aggravating content. Furthermore, the use of untrusted websites and the unauthorised distribution of copyrighted or licensed material, such as but not limited to computer software, are forbidden. Chain letters or petitions should not be sent without express authorisation.

It is important to always carefully protect data used to access PHOENIX group networks, such as user names and passwords, security codes or building access codes. Any potential security incidents relating to e-mail, computer, or network security should be reported to the local IT department without delay. Local IT guidelines must always be observed.



How to proceed in unclear situations



How to raise a concern

CONFIDENTIAL INFORMATION

WE ARE COMMITTED TO CONFIDENTIALITY

Confidential information is all data and knowledge that is not publicly accessible and whose disclosure or unauthorised use could harm the interests of the PHOENIX group or the parties concerned. Its protection is not only key to comply with legal obligations but also to maintain our competitive advantage and uphold our reputation. Protecting business secrets and sensitive information are also essential to avoid claims by third parties and prevent potential business damages.

We are responsible for safeguarding confidential information. This includes understanding what constitutes confidential information, recognizing the importance of maintaining its secrecy, and adhering to company guidelines and legal requirements. Confidential information should only be accessed, used, or disclosed, when authorised and necessary for job responsibilities.



Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [Legal Guidance and Reporting Guideline](#).

If you have questions or need support, contact your legal department or Corporate Compliance at ✉ compliance@phoenixgroup.eu

GUIDING QUESTIONS

Am I generally vigilant and mindful about disclosing potentially confidential information?

Do I know the relevant steps to prevent unauthorised disclosure of confidential information?

Have I ensured that (potential) confidential information disclosed to third parties is covered by an appropriate non-disclosure agreement and/or by appropriate confidentiality clauses?



AGREEMENTS FOR SHARING INFORMATION

Before making potential confidential information available to an external party, please ensure that a Non-Disclosure Agreement (NDA) is signed. Other names for an NDA are Confidentiality Agreement or Secrecy Agreement. Wherever possible, use the appropriate PHOENIX group template. The latest version is available at your legal or compliance department.

When agreeing a Non-Disclosure Agreement or a confidentiality clause in a contract, please seek to ensure that the information you receive can be shared with other PHOENIX group companies.



How to proceed in unclear situations



How to raise a concern

GUIDING QUESTIONS



How do I protect personal data and report any related incidents?

Is it necessary for my work to collect and store certain personal data?

When can I share personal data with an external provider?

Can I record online meetings with colleagues or customers?

DATA PROTECTION

WE RESPECT PEOPLE'S PRIVACY BY PROTECTING THEIR PERSONAL DATA

Data protection is about protecting all information relating to individuals – such as names, contact details, photographs or any further identifiers. So compliance with data protection laws and regulations does not only prevent our company from receiving fines, but it also boosts the trust of our customers, business partners and employees in our organisation. We expect the same from our business partners, especially if they process data on our behalf. Recognising that health data is a special category of personal data with stricter protection, we treat this data with special care and vigilance.

The PHOENIX group is committed to processing personal data in a lawful, fair, transparent, secure and ethical manner to affirm the fundamental human right to privacy. If any type of personal data is collected for a specifically defined purpose, it must be protected. You may only collect, access, process, store or disclose personal data when this is necessary and if you are authorised to do so as part of our job responsibilities. Even then, you should always act in compliance with legal requirements and regulations.



Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [Data Protection Guideline](#).

Every PHOENIX group company has its own internal channel regarding data protection and a dedicated contact person. The relevant area in CONET is » [Data Protection and Information Security](#), where you will find a contact list of all local Data Protection Officers.

If you have any questions or need support, contact your local Data Protection Officer or Corporate Data Protection via ✉ dataprotection@phoenixgroup.eu.



How to proceed in unclear situations



How to raise a concern

CORPORATE SECURITY

WE PROTECT OUR CORPORATE ASSETS AT ALL TIMES

Besides protecting data and information systems, securing our physical assets is essential for ensuring business resilience. Theft is possible even with surveillance and inventory tracking in place. And physical security breaches may lead to supply chain disruptions, causing delays, product recalls or reputational damage. However, implementing strong security measures helps to build trust with clients and partners, fostering stronger business relationships and supporting sustainable business practices in the long run.

Employees play a critical and essential role here in enforcing corporate security and thereby protecting corporate assets. This sound attitude involves taking personal responsibility for safeguarding company property, following established security protocols and permanently staying vigilant towards potential security risks or suspicious activities of any kind. By demonstrating a clearly proactive approach – whether it be duly handling inventory with a protective focus, promptly reporting concerns to the responsible persons or ensuring functionally intended access control routines in accordance with instructions – employees establish and nurture an organisational security culture. This mindset of situational awareness not only protects valuable corporate assets but also strengthens the company's reputation for reliability, resilience and trustworthiness.



Do you want to know more?

If you have any questions or need support, contact ✉ corporate-security-general@phoenixgroup.eu.

GUIDING QUESTIONS

Have I reported any suspicious activity or security breaches to the appropriate contact person(s) in the organisation and/or to the authorities?

Am I following the proper procedures for securing and handling sensitive or valuable corporate assets?

Is this action or decision likely to put corporate assets (such as inventory, equipment or facilities) at risk?

Are access control measures in place to prevent unauthorised personnel from getting access to valuable corporate assets?

Can I identify any potential vulnerabilities in the storage, transportation or delivery of corporate assets?



How to proceed in unclear situations



How to raise a concern

MARKET INTEGRITY

As a participant in global value chains, we are committed to the principles of the market economy and fair competition. And we are convinced that healthy competition is key to maintaining trust, driving innovation and empowering consumers – which is in turn the foundation of our success.





GUIDING QUESTIONS

Have I reported any potential quality issues, deviation or concerns that could affect the safety or effectiveness of the product?

Am I aware of all applicable Standard Operating Procedures (SOPs) and templates affecting my daily work?

Am I following all established quality management processes and standards to ensure the product meets safety and efficacy requirements?

PRODUCT QUALITY

WE ENSURE PRODUCT QUALITY IN ALL OUR BUSINESS PROCESSES

The PHOENIX group is committed to ensuring excellence within the supply chain of healthcare products and services. Delivering good quality, meeting the needs and expectations of all our customers is how we get ahead of our competitors and strengthen long-term business relationships. Failing to meet product quality standards, on the other hand, can erode customer trust, damage relationships with healthcare providers and result in significant financial losses due to lawsuits and regulatory fines.

There is strict European and local legislation in place with regard to the manufacturing and distribution of medicinal products and medical devices, which constitute the main part of our portfolio. Therefore, we work for continuous improvement and efficiency to comply with all relevant national and international requirements. This particularly applies to the storage, handling and distribution of medicinal products.

We also hold our suppliers accountable to provide high-quality, safe and effective goods and products in accordance with applicable laws and regulations (e.g. Good Manufacturing Practices, medical device legislation).



Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [European Quality Statement](#) and » [European Quality Manual](#).

If you have any questions or need support, contact ✉ corporatequalitymanagement@phoenixgroup.eu



How to proceed in unclear situations



How to raise a concern

CONFLICTS OF INTEREST

WE ACT WITH LOYALTY AND INTEGRITY

We must ensure that we make decisions that are in the best interest of the PHOENIX group. In this way, we maintain trust and confidence with all our employees but also with other internal and external stakeholders. When conflicts of interest are not properly managed or disclosed, they can undermine trust within the organisation, damage relationships with clients and regulators, and expose our company to potential financial and reputational risks. Therefore, employees are obliged to disclose conflicts of interest.

Conflicts of interest are situations where personal gain may influence our professional judgement. Due to their nature these can be very individual. Having a conflict of interest is not misconduct – but the way we handle it could be. To be clear: we do not misuse our position and do not make decisions for our personal gain.

GUIDING QUESTIONS

Am I certain that my decision is based only on objective criteria such as quality, price or the reliability of a supplier?

Could others think that I am personally benefiting from what I am planning to do?

Could others perceive my business decision as being influenced by my relationship with another person?

CHALLENGING SITUATIONS

The following situations may cause such conflicts of interest, but are not exhaustive:

- Being affiliated with, or having a significant financial interest (e.g. shareholding position) in a company or organisation that is a supplier, customer or other business partner of the PHOENIX group
- Supervising or having the responsibility for hiring a family member or friend

Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [Anti-Corruption Guideline](#).

The relevant area in CONET is » [Compliance](#).

If you have any questions or need support, contact your line manager or your Local Compliance Manager.

You can also contact Corporate Compliance at compliance@phoenixgroup.eu.



How to proceed in unclear situations



How to raise a concern



GUIDING QUESTIONS

Have I discussed any (potential) competition issue with a competitor, and/or am I sure the contract fully complies with competition laws?

Am I aware of which data and information can be shared with a business partner?

Is the association I am a part of acting transparently and in compliance with applicable laws and internal regulations?

FAIR COMPETITION

WE STRIVE FOR FAIR COMPETITION

Fair competition creates an open and transparent market. This is important for us to ensure sustainable growth and to make sure we are a reliable business partner. We believe that fair, well-regulated competition strengthens our market – and benefits us as well as our customers.

We are committed to conducting business solely based on free and fair competition, and we strictly obey competition laws and industry practices. As a market leader in various fields, the PHOENIX group has special obligations under antitrust law. Violations of antitrust law can result in very high fines for the group, management and our employees concerned. We stay cautious for any situation which is or may be seen as being harmful to free and fair competition.



Do you want to know more?

More information can be found in the respective section of the » **Rules Register** or in our » **Competition Compliance Guideline**.

The relevant area in CONET is » **Compliance**.

If you have any questions or need support, contact your line manager or your Local Compliance Manager.

You can also contact Group Compliance at ✉ compliance@phoenixgroup.eu



SOME OF OUR FAIR COMPETITION PRINCIPLES

- We do not, directly or indirectly, align prices, rebates, or any other trading conditions.
- We do not enter into agreements that include unfair limitations or restrictions on the market behaviour of our customers or suppliers.
- We share market-relevant information internally and externally only in consultation with the Local Compliance Manager, because inappropriate exchange of information can open the door to uncompetitive behaviour.
- We do not abuse our market-dominant position, if any, through unfair business conditions or unjustified discrimination of business partners.
- We must not inadvertently or deliberately make false statements about competitors or express ourselves in an unprofessional way in public about a competitor's activities, products or services.
- We do not steal or abuse competitors' business secrets.
- All information gathered about competitors should come from legitimate and public sources only – such as websites or seminar materials. It should always contain a reference to the source.



How to proceed in unclear situations



How to raise a concern

ANTI-CORRUPTION AND BRIBERY

WE DO NOT TOLERATE CORRUPT BEHAVIOUR

Bribery and corruption lead to decisions that are not based on objective criteria. This can damage free and fair trade, on which our business model is built. Unfair advantages through corruption and bribery may lead to negative impacts on customers, users, suppliers, competitors and society as a whole. Only if we strive for a fair and open business culture can we make sure that the PHOENIX group continues to grow as a leading company in the healthcare market. By acting fair and with integrity, by going beyond legal requirements and by treating our customers and business partners with honesty and respect, we avoid financial, legal and reputational risks.

We do not promise, offer or give bribes or anything of value to government officials or to our business partners in the private sector with the intent to improperly influence their conduct. We also do not receive anything of value that could be perceived as improperly influencing our conduct. And we do not tolerate corrupt behaviour by our colleagues, business partners or customers. To prevent possible harm to the PHOENIX group, we avoid even the mere appearance of undue influence. Furthermore, we are committed to the prevention, deterrence and disclosure of illegally gained assets and all other corrupt business practices – for example fictitious transactions.

GUIDING QUESTIONS

Could I get into trouble if what I am about to do were publicly reported or reviewed by an auditor?

Am I certain that my actions comply with all laws and regulations related to anti-corruption, both locally and internationally?

Have I made sure in advance that my potential business partner is trustworthy, or does it have a reputation for questionable business practices?

Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [Anti-Corruption Guideline](#).

The relevant area in CONET is » [Compliance](#).

If you have any questions or need support, contact your line manager or your Local Compliance Manager.

You can also contact Corporate Compliance at [✉ compliance@phoenixgroup.eu](mailto:compliance@phoenixgroup.eu).



How to proceed in unclear situations



How to raise a concern

GIFTS, INVITATIONS, DONATIONS AND SPONSORSHIPS

WE VALUE OUR BUSINESS RELATIONSHIPS

In the course of business relationships there is always a risk that gifts, hospitality or donations and sponsorships may be viewed as a bribe or as being excessive. This may lead to damaged reputation and legal liabilities which can have a negative impact on our business as well as on our customers, users, suppliers or competitors.

We always make sure not to create the appearance of impropriety or a conflict of interest. Therefore, we only offer or accept gifts which have a moderate value and pay attention to the image that can be created due to the external circumstances and the overall situation. We follow simple rules: we check if the correct conditions apply, comply with the local value limits or ask for approval from our line manager. In this way, we not only ensure compliance with the rules, but also support trusting relationships with our business partners.

We express our social commitment through donations and sponsorships – but do not use them to influence business decisions. We carefully examine donations and sponsorship activities to determine whether they are in line with our core values, promote the company's legitimate objectives, do not obtain improper business advantages, are religiously and politically neutral and strengthen our brand and social commitment.

GUIDING QUESTIONS

Do I consider this gift to be appropriate?
As an external third person,
would I consider this gift as harmless,
or does it give me an uneasy feeling?

Does a gift or invitation come
with some kind of obligation, or
can it be interpreted as a bribe?

Am I aware of the
local value limits,
and have I obtained
the required
approvals?

Have I made sure to
carefully consider if this
donation is in line with our
company's values, funding
priorities and regulations?



Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [Anti-Corruption Guideline](#).

The relevant area in CONET is » [Compliance](#).

If you have any questions or need support, contact your line manager or your Local Compliance Manager.

You can also contact Corporate Compliance at ✉ compliance@phoenixgroup.eu.



How to proceed in unclear situations



How to raise a concern

ANTI-MONEY LAUNDERING

WE PREVENT ALL INVOLVEMENT IN MONEY LAUNDERING

Adhering to strict anti-money laundering measures not only ensures compliance but also strengthens trust and transparency with customers, suppliers and competitors, supporting long-term business stability. Money laundering is a major criminal act that undermines the stability and integrity of the financial system. Any involvement in money laundering activities may have serious legal and reputational consequences.

The fight against money laundering is a shared responsibility. We must ensure the PHOENIX group is not used for any illegal activities and take all reasonable measures to prevent our organisation from being used as a means of money laundering. We only work with reputable business partners and use resources from legitimate origins.

GUIDING QUESTIONS

Am I sure the value limit for cash payment of this transaction is in line with company guidelines?

Does this money transaction feel right to me? What does my gut feeling tell me?



Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [Anti-Money Laundering Guideline](#).

The relevant area in CONET is » [Compliance](#).

If you have any questions or need support, contact your line manager or your Local Compliance Manager.

You can also contact Corporate Compliance at ✉ compliance@phoenixgroup.eu.



How to proceed in unclear situations



How to raise a concern

SANCTIONS AND EMBARGOES

GUIDING QUESTIONS

Have I checked the Greylist and Blacklist in our Sanctions & Embargoes Guideline before entering into a new business relationship outside home territory?

Is there any reason to suspect our product or service may be used illegally?

Do I have any reason to believe our business partner is on a sanction list or located in an embargoed country?

WE PROTECT AND PROMOTE SAFE AND FAIR INTERNATIONAL BUSINESS

We operate in many markets – thus, our activities are subject to various national and international trade laws. Complying with customs regulations, export controls and trade sanctions laws allows us to work with reputable business partners. This is how we avoid criminal or civil penalties and protect the company's reputation as an ethical and trustworthy partner and employer.

We comply with sanctions, embargoes and applicable export control laws. We constantly make sure not to engage with embargoed countries or regions, and do not engage with persons or companies that have been placed on a sanctioned party list.



Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [Sanctions & Embargoes Guideline](#).

The relevant area in CONET is » [Compliance](#).

If you have any questions or need support, contact your line manager or your Local Compliance Manager.

You can also contact Corporate Compliance at
✉ compliance@phoenixgroup.eu.



How to proceed in unclear situations



How to raise a concern

RESPONSIBILITY TOWARDS SOCIETY AND THE ENVIRONMENT

The PHOENIX group is committed to running its business in a way that prioritises sustainability at all levels. We are aware of our impact on society and the environment and take full responsibility for minimising it. After all, this is the only way we can ensure a safe and healthy future – and our long-term success.



ENVIRONMENTAL PROTECTION

WE PROTECT THE ENVIRONMENT TODAY FOR TOMORROW

Climate change is among the greatest global challenges of our time. The limits of several natural boundaries have been reached or exceeded, leading to serious consequences for both the environment and businesses. The environment provides essential resources for constructing, powering, and maintaining our business and the communities in which we operate. When these natural resources are depleted or damaged, this can disrupt supply chains, increase costs, and impose stringent regulatory burdens on companies. We only have one planet – so we must treat it with care. Moreover, conscious and efficient use of our environment and ecosystem services not only allows for our economic success but is vital for people's health and a sustainable future.

We are dedicated to responsible environmental practices, the least of which is to comply with all relevant environmental laws and regulations. In addition, we strive to minimise the impact of our business activities and value chain on the environment. All employees are expected to carry out their daily tasks in an environmentally friendly manner. Every employee should actively support environmentally friendly behaviour: we are committed to energy efficiency and climate protection. We use natural resources including water and materials efficiently, following the 3R principle: reduce, reuse and recycle wherever possible. We separate waste to achieve a high reuse rate and ensure that hazardous substances and waste are handled and disposed of properly. And we are constantly working on integrating more environmentally friendly solutions into our business operations and along our value chain.



Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [Sustainability Reports](#) and » [Climate Guideline](#).

The relevant area in CONET is » [Environment](#).

If you have any questions or need support, contact your » [Local Sustainability Manager](#).

You can also contact
✉ sustainability@phoenixgroup.eu.

GUIDING QUESTIONS

Which laws, regulations and guidelines are relevant to my daily tasks?

How can I address issues when I observe behaviour and processes that should be improved, or which currently actually harm our environment?

How can I reduce my or our use and consumption of energy, water or other resources?



How to proceed in unclear situations



How to raise a concern

RESPONSIBLE TAX PRACTICES

WE OPERATE THOROUGHLY AND IN COMPLIANCE WITH TAX LAW

Paying taxes is our contribution to society and the communities from which we benefit. We are obliged to implement and comply with local tax laws. Violations of these obligations may result in personal liability of the executive bodies of the PHOENIX group, cause economic disadvantages and could lead to reputational damage. To avoid this, we need to respect and comply with our Tax Directives and Guidelines.

Conscientious, honest and accurate accounting and documentation are key elements for fulfilling our duties towards tax authorities. We expect that information about business transactions is properly documented and that every important document is stored in accordance with retention obligations. Documentation is not only compliance-relevant in itself but also supports the correct declaration of taxes and duties. This includes possible personal benefits such as gifts for employees or business partners as well as when planning a business event.

GUIDING QUESTIONS

I am planning a business event, where we distribute gifts and organise a dinner. Do I know who to contact in view of possible tax-related consequences?

Am I confident that no actions I take could lead to tax evasion, avoidance or misrepresentation of the company's financial position?

Am I aware of my responsibilities including potential reporting, retention or information obligations according to PHOENIX tax guidelines?

Do I understand the tax implications of all cross-border activities, and have I taken steps to ensure compliance with local tax regulations?



Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [Corporate Tax Guideline](#), » [Transfer Pricing Guideline](#) and the » [International Tax Directive for Non-German Subsidiaries](#).

The relevant area in CONET is » [Corporate Tax](#).

If you have any questions or need support, contact [✉ grouptaxes@phoenixgroup.eu](mailto:grouptaxes@phoenixgroup.eu).



How to proceed in unclear situations



How to raise a concern

POLITICAL ACTIVITIES AND LOBBYING

WE ARE TRANSPARENT IN OUR RELATIONSHIPS WITH POLITICIANS AND GOVERNMENTS

Ethical and transparent political activities and lobbying efforts can foster innovation, promote public health and strengthen sustainable business practices, ultimately benefiting the company and society. By contrast, engaging in improper activities may lead to conflicts of interest, corruption allegations and a loss of public trust, which could undermine the credibility and reputation of the PHOENIX group.

We want to represent our legitimate interests as a healthcare provider to governments and politicians – and we contribute insights and experience of our market-leading position. When we engage with politicians and policy makers, we are representing our company and its values. Therefore, we want to make sure that we are contributing positively to law-making processes in the markets in which we operate. By encouraging a culture of integrity, transparency and compliance with applicable rules we make sure that the healthcare sector takes care of its customers and puts their interests first.

GUIDING QUESTIONS

Have I made sure that I am aware of local laws and internal regulations concerning lobbying activities?

Is this an appropriate timeframe to contact a political party, or may it be perceived as an inappropriate influence?

Am I representing a general interest and making sure to encourage an improvement in applicable healthcare regulations?



Do you want to know more?

More information can be found in the respective section of the » [Rules Register](#) or in our » [Anti-Corruption Guideline](#) or » [Corporate Public Affairs Guideline](#).

If you have any questions or need support, contact your line manager, your Local Compliance Manager or your Local Public Affairs Manager.

You can also contact Corporate Compliance and Corporate Public Affairs at

✉ compliance@phoenixgroup.eu and

✉ corporatepublicaffairs@phoenixgroup.eu



How to proceed in unclear situations



How to raise a concern

EXTERNAL COMMUNICATION AND SOCIAL MEDIA

WE COMMUNICATE RESPONSIBLY AND WITH CONSIDERATION

The PHOENIX group wants to avoid unethical or unlawful communication, such as spreading misinformation or engaging in discriminatory language, because this could damage our reputation, erode trust among stakeholders or expose the company to legal liabilities. Ethical and lawful communication, on the other hand, fosters a culture of transparency, trust and respect – enhancing relationships and promoting long-term business success.

DEALING WITH EXTERNAL REQUESTS

Requests from media and other external organisations asking you to speak on behalf of the PHOENIX group should not be answered by you as an employee, but forwarded to Corporate Communications, your Country Management or your country's Communications Manager. This includes but is not limited to requests for information, statements, interviews or other types of media enquiries by TV/radio, (online) newspapers and magazines, local/national and trade media. Also, you should not comment on anything that could deliberately harm the company or damage its reputation.

Only the PHOENIX group CEO, the PHOENIX group Communications Director or their designated representatives may communicate sensitive information, such as the company's financial results or the profitability of business activities. All country organisations ensure similar practices for local communications.

Targeted external communication is part of our business strategy. It is particularly important for our reputation that all information issued by PHOENIX is accurate, consistent and timely. To protect our company's interests, we need to comply with all legal requirements. The PHOENIX group employs experienced communications specialists, who are aware of and act in accordance with these requirements.

GUIDING QUESTIONS

Who owns this information or knowledge, and am I free to share it with others?

Does this comment on social media cast a bad light on anyone in connection with PHOENIX or on the group itself? When we express personal views, are they clearly labelled as such?

Could sharing this information cause harm or damage to the PHOENIX group's reputation?

HARMFUL COMMUNICATION FROM THIRD PARTIES

If you become aware of any event or topic where a third party may harm the reputation of the PHOENIX group, you should immediately report them to Corporate Communications, your Country Management or your country's Communications Manager.

RESPONSIBLE USE OF SOCIAL MEDIA

For a responsible use of social media, all employees should be mindful not to make comments that deliberately damage the company's business or its reputation. Also, negative statements about colleagues, business partners or other stakeholders are to be avoided. These statements include but are not limited to threats and insults, disrespectful material (e.g. photos, videos), falsehoods and statements that seriously harm the company and make further cooperation impossible. These rules apply to media such as LinkedIn, Facebook, Instagram, X (formerly Twitter), blogs or others.

Do you want to know more?

If you have any questions or need support with regard to communication and social media, contact your country's Communications Manager or Corporate Communications via media@phoenixgroup.eu.



How to proceed in unclear situations



How to raise a concern

