

Code of Conduct

FAQ

What is the Code of Conduct?

The Code of Conduct consists of ten principles that must be adhered to by all B. Braun employees worldwide. Complying with these principles offers the best possible guarantee of "compliance", i.e. legally compliant conduct. The Code of Conduct applies to all employees, from commercial employees to Management Board members.

Why does B. Braun need a Code of Conduct?

As a responsible family-owned company, B. Braun is synonymous with legally and ethically irreproachable conduct. With the rules set out in the Code of Conduct, B. Braun obliges all employees to conduct themselves in a legally compliant manner. This framework provides guidelines for legally compliant conduct. In addition, codes of conduct have a longstanding tradition in other countries and are seen as a useful supplement to existing legal and social instruments. In Germany, the 'German Corporate Governance Code' obliges companies and their employees to adhere to all external and internal guidelines.

What is the Code of Conduct based on?

In the Group Strategy, the Management Board set out ten guidelines for B. Braun's business practices. One of these is a voluntary commitment to compliance. The underlying conditions required for this are provided by the Code of Conduct, which itself is based on fundamental, internationally valid laws. This means that this Code of Conduct provides the foundation for legally compliant conduct. Needless to say, employees must also comply with the local laws of their respective countries.

What does Compliance mean?

Compliance essentially means conforming with existing legal requirements.

Is adhering to the Code of Conduct enough to ensure Compliance?

By following the principles set out in the Code of Conduct, it is possible for any B. Braun employee to comply with the requirements for his or her specific working environment. However, it is not possible for the ten principles to cover all eventualities. Because of this, local Compliance Officers are at hand to assist employees with any questions they might have.

How are the elements of the Code of Conduct implemented in practice?

In addition to communicating the guidelines extensively throughout the company, B. Braun employees are also given specific training. A comprehensive program will be made available to communicate the contents of the Code of Conduct in a straightforward way. Furthermore, the local Compliance Officer and – optionally – a local Compliance Committee employee will help to implement the Code of Conduct principles.

What influence does Compliance or Non-Compliance have on business performance?

Legally and ethically irreproachable conduct is the basis for all B. Braun business relationships. The Code of Conduct sets the binding framework for this voluntary commitment within the legal environment of the country in question. In this way, compliance will also manifest itself at organizational level as the basis for sustainable business performance. This means that compliance is a decisive factor for positive business development.

What should employees do if they are unsure whether they are complying with the Code of Conduct?

In the culture of open communication at B. Braun, managers are urged to assist their staff in implementing the Code of Conduct. Employees who are uncertain about adherence to the Code of Conduct should first consult with their direct superiors. If, having done this, they are still unsure, they can then approach their local Compliance Officer.

What should B. Braun employees do if they are unsure whether all processes in their area are compliant?

If employees suspect that projects and activities in a specific area might conflict with B. Braun's Compliance Management System, they can call or email their local Compliance Management contact at any time. Queries and notifications can also be sent by internal post. Needless to say, all queries will be treated with the strictest confidence.

What will happen to employees who are in breach of one or more provisions of the Code of Conduct?

Decisions are made on a case-by-case basis depending on the individual circumstances. All breaches will be followed up.

What is the basic for B. Braun in their interactions with Healthcare Professionals and Healthcare Organizations?

As stated in our Code of Conduct and in our Guidelines, we are committed to the highest standards of behavior in our business practices throughout the world. We grant neither illegal or unjustified benefits or advantages, nor do we accept such benefits or advantages. Our interactions with Healthcare Professionals and Healthcare Organizations are based on ethical standards including integrity, fairness, sustainability and transparency both within, and outside, the Global B. Braun Group.

To whom should employees address questions regarding the Code of Conduct or Compliance?

B. Braun employees who have questions on these matters can seek assistance from their direct superiors or their local Compliance Officer. They can also approach the official contacts for the Compliance Management System.

How do you compose a notification in the whistleblower system?

Notifications can be made to the Compliance Office in a number of ways. Post, telephone and e-mail are all possible methods (contact details).

It is important that the following questions are answered in full in all notifications:

1. Who?

A notification must make it clear who the sender is. Only if the sender can be easily identified can an effective dialogue be launched. An exception regarding anonymous notifications is explained at the end of these questions.

2. What?

A notification must be formulated in a way that enables the facts on which the notification is based to be determined. Please note that the Compliance Officers rely on receiving the full facts of each case. Further information may also be required, which is why it is often helpful if you do not submit your notification anonymously, as this will enable further enquiries to be made. For information about what content is not appropriate in a notification, see „What issues must not be notified via the whistleblower system“.

3. When?

It is important to specify exactly when the events described took place so that responsibilities and other facts relating to the case can be assigned appropriately. The notification should be made promptly (generally speaking, within a few days). There is little that can be done about incidents that took place a long time ago.

4. Where?

The place from which the notification is being made should be specified as precisely as possible; please state the relevant country, location, plant, division and department wherever possible.

Anonymous notifications

Anonymous notifications deviate from the pattern described above. To make your notification anonymous, please submit it via an e-mail account which prevents you being personally identified, for example, from an address you yourself have set up under a pseudonym; this is easy to do using private e-mail services.

When composing the notification, you should focus on the question of WHAT (see Point 2 above). All details you give in relation to places and times must be carefully selected to make it difficult or impossible to identify you. However, further enquiries may still be necessary, so we ask that you continue to check the anonymous e-mail account regularly so the anonymous contact can be kept up.

We guarantee that all data and personal rights regarding notifications made via the whistleblower system will be protected to the highest possible degree.

Many thanks in advance for your support!

What issues must not be notified via the whistleblower system?

The whistleblower system serves to clarify issues relating to compliance and B. Braun's Code of Conduct. If an individual were to use it to make allegations or complaints against one of our employees for personal or political reasons, this would represent an abuse of the system. We may take action in the event of such abuse.