

Code of Conduct for Distribution Partners

Tyromotion GmbH is a leading manufacturer of advanced therapeutic devices that help improve independence and quality of life for people around the world. Our company began with the development of AMADEO, a device created to provide therapy for a loved one when suitable options were not available. That founding purpose continues to shape our work today.

We are committed to helping patients with neurological impairments and related disabilities reach their full potential. We value the trust placed in us by patients and customers, and we are committed to maintaining the highest standards of safety, performance, and quality in all our products. For us, quality means meeting customer needs and ensuring customer satisfaction.

We design, manufacture, and distribute our medical devices with the same care we would expect for ourselves and our own families. In addition to offering innovative products, Tyromotion is committed to responsible business conduct in every part of its operations. This includes acting with integrity, respecting people and the environment, and complying with all applicable laws, regulations, and standards.

Objective

This Code of Conduct sets out the minimum standards that all Tyromotion distribution partners must follow. Distribution partners must comply with this Code and with all applicable laws and regulations. Where this Code is stricter than local law, the stricter requirement applies.

Scope and implementation

Distribution partners are expected to act responsibly in all areas of their business and in their local, national, and international communities. This includes business, political, environmental, and social activities.

Distribution partners must ensure that their subcontractors also comply with these requirements. Any agreement with a subcontractor must be in writing and must include compliance and audit rights to ensure that all obligations under the Tyromotion agreement are met. Tyromotion retains the right to audit and inspect compliance where specified in the relevant contract.

Business ethics

Tyromotion expects its distribution partners to compete fairly and on the merits of their products and services. They must not seek unfair advantages or use improper influence in any way.

Corruption and bribery

No form of corruption or bribery is tolerated. Distribution partners must comply with all applicable anti-corruption and anti-bribery laws, both locally and internationally. They must ensure that all personnel acting on their behalf understand and comply with these rules.

A distribution partner must not, directly or indirectly, offer, give, promise, or authorize any bribe, gift, loan, fee, reward, or other advantage to a government official, customer, Tyromotion employee, or any other person in order to gain a business advantage or improperly influence a decision. Distribution partners must also never accept or agree to accept a bribe, kickback, or similar benefit.

Fraud

Tyromotion has zero tolerance for fraud. Any suspected fraud will be investigated and may be referred to law enforcement if appropriate.

If a distribution partner is asked to take part in fraud or is offered involvement in a kickback scheme, the matter must be reported to Tyromotion's business ethics hotline.

Books and records

All transactions and expenses made on behalf of Tyromotion must be recorded accurately, completely, and in a timely manner. Records must comply with generally accepted accounting principles.

False, misleading, incomplete, duplicate, inaccurate, or artificial entries are strictly prohibited. Distribution partners must maintain adequate internal controls to support accurate reporting.

Gifts and business hospitality

Any gift, hospitality, or business courtesy must comply with applicable laws and regulations and must also meet the standards of the recipient's organization.

Gifts and hospitality must be modest, must not be intended to influence business decisions, and must always be connected to legitimate business purposes. Stricter rules apply when dealing with healthcare professionals and government officials.

Donations and contributions

Political contributions, charitable donations, or sponsorships must never be used, or appear to be used, to gain an unfair advantage or improper influence.

Charitable donations may only be made to legitimate charitable or non-profit organizations. They must not be made to individuals and must not be linked to past, present, or future business with Tyromotion or to any expected influence or outcome.

Conflict of interest

Distribution partners must avoid actual, perceived, or potential conflicts of interest. Any conflict must be disclosed to Tyromotion in writing as soon as it is identified so that appropriate measures can be taken.

Competition law

Distribution partners must comply with all applicable competition and antitrust laws. They must never coordinate with competitors to fix prices, set minimum prices, agree on supply conditions, or otherwise restrict fair competition.

Tenders

Public tenders must be handled in compliance with all applicable laws and regulations. If a distribution partner needs a letter of representation from Tyromotion to participate in a tender, Tyromotion will issue it only where there is a current written agreement in place.

Only official and publicly available information about Tyromotion's products and services may be provided. Distribution partners must not collude with tender authorities, healthcare professionals, or

subcontractors in the preparation or structure of procurement processes, and they must not provide unofficial marketing materials or seek improper influence over decision-makers.

Export controls and trade restrictions

Distribution partners must comply with all applicable trade control, sanctions, export, and re-export laws when dealing with Tyromotion products, services, software, or technology.

Patients and patient organizations

Patients and people with healthcare needs must always be treated with dignity and respect. They must receive balanced, fair, and timely information about Tyromotion products and services.

Distribution partners must never interfere with the relationship between patients and healthcare professionals. Any remuneration paid to patients or patient organizations must reflect fair market value and must be appropriate for the services provided.

Data privacy

Distribution partners must respect the privacy and data protection rights of employees, customers, patients, and others they work with. They must comply with all applicable privacy laws and with contractual confidentiality and information security requirements.

Intellectual property and confidential information

Distribution partners must protect Tyromotion's proprietary and confidential information. Non-public information obtained through the business relationship must not be used improperly for the benefit of the distribution partner, its employees, or any third party.

Government officials and healthcare professionals

Distribution partners must never offer anything of value to a government official or healthcare professional if it could be seen as an attempt to improperly influence a decision to purchase, use, or recommend Tyromotion products.

Meetings and hospitality

Hospitality, including meals, may only be provided to healthcare professionals where permitted by law and applicable industry rules, and only in connection with a legitimate event or meeting. Events must take place in appropriate venues, and any hospitality must remain modest and secondary to the main business purpose. Travel arrangements must also be reasonable.

Consultancy arrangements

Distribution partners may pay individuals, including physicians or other customers or potential customers, for genuine consulting services related to Tyromotion products, provided the services are needed, the fees reflect fair market value, and the arrangement is documented in writing.

Where required, written notice must be given to the hospital administration, the healthcare professional's superior, or another locally designated authority, stating the purpose and scope of the consultancy arrangement.

Gifts and advantages to healthcare professionals and government officials

Gifts or other advantages to healthcare professionals and government officials are generally prohibited. They may only be given where allowed by local law or applicable industry codes, and then only if they are of modest value and serve a professional, educational, or patient-related purpose. Cash or cash equivalents must never be given on Tyromotion's behalf.

Transparency

Distribution partners must comply with all applicable transparency and reporting requirements for consultancy fees, grants, hospitality, and other transfers of value to healthcare professionals and healthcare organizations. They must also follow any approval requirements for educational grants and sponsorships.

Where no specific rules apply, distribution partners must still act transparently, including by giving prior written notice to the relevant hospital administration, superior, or other competent authority when appropriate.

Labour and human rights

Distribution partners must respect all applicable laws, regulations, and international standards relating to labour practices and human rights.

Health and safety

Tyromotion expects its distribution partners to provide a safe and healthy working environment for employees and others present at their sites.

Employment conditions

Distribution partners must provide employees with a written employment contract or other document setting out the main terms of employment in a language they understand and in accordance with local law. This document must include, at a minimum, the workers' rights covered by this Code.

They must also maintain fair disciplinary, grievance, and termination procedures. Special care must be taken to protect migrant workers, who may face additional risks or limited access to public services.

Non-discrimination and equal opportunity

Distribution partners must treat employees equally and must not permit any form of discrimination. Workplaces must be free from harassment, abuse, corporal punishment, mental or physical coercion, sexual harassment, and threats of such treatment. Tyromotion encourages distribution partners to actively promote inclusion and diversity in their workforce.

Environmental responsibility

Distribution partners must consider environmental impacts in their activities and work toward continuous improvement by reducing negative effects on the environment.

They must comply with all applicable environmental laws and regulations, as well as any required environmental permits or licenses.

Raising concerns

Distribution partners who believe that a Tyromotion employee, or anyone acting on Tyromotion's behalf, is behaving unethically, improperly, or illegally should report the concern at <https://whistle.tyromotion.com/en>.

Consequences of non-compliance

The purpose of this Code is to support responsible business practices through ongoing dialogue and cooperation. If this Code is not followed, the issue will be brought to the distribution partner's management for review and possible corrective action.

Serious or repeated non-compliance may be considered a material breach of the agreement and may lead to immediate termination or other legal action, including claims for damages. Tyromotion reserves all rights in such cases.