



Code of Business Conduct



CODE OF BUSINESS CONDUCT

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We report all incidents which in our good faith judgment raise concerns of misconduct or violations of laws, regulations or Company policy.

1. BASIC PRINCIPLES

1.1

The purpose of this Code is to provide guidance for business behavior in critical areas relating to the business activities of medmix. The Code does not cover every situation where compliance or ethical behavior may be required, but rather sets forth minimum standards and a spirit which are fundamental to the way we conduct our business.

1.2

medmix's basic values and principles include the following:

- a) We respect and comply with all applicable laws and regulations as well as with internal regulations, directives and guidelines. This means:
- We do not give or take bribes. We avoid giving or receiving gifts which could create a conflict, violate the standards of those we are dealing with or violate the law.
 - We do not participate in any acts or omissions which could be considered violations of applicable competition and antitrust laws, such as the written or verbal exchange of sensitive data with competitors.
 - We avoid conflicts of interest and disclose potential conflicts as early as possible.

- We protect our confidential and proprietary information from unauthorized use.
- We respect and secure our know-how and intellectual property rights.

b) We comply with locally accepted standards of good corporate citizenship in each country in which we do business.

c) We promote and sustain a work environment that fosters mutual respect, openness and individual integrity, and we support and respect the protection of internationally proclaimed human rights.

d) We report all incidents which in our good faith judgment raise concerns of misconduct or violations of laws, regulations or Company policy. Reports can be submitted to the following persons or departments

- Supervisor or manager
- Human resources department
- Compliance officer
- Legal department

1.3

Useful information can be found on the medmix Intranet.

2. ACCURACY AND COMPLETENESS OF RECORDS

2.1

We keep accurate and complete business records. All our business transactions must be fully and fairly recorded in accordance with medmix's accounting and financial reporting principles, and records are retained or destroyed in accordance with the record retention program of all our affiliates and subsidiaries ("Company").

2.2

False or misleading entries must not be made in the books and records of medmix or any of its subsidiaries for any reason, and no employee shall engage in any arrangement which results in such a prohibited act.

We keep accurate and complete business records.

medmix requires full compliance with applicable antitrust and competition laws.

3. ANTITRUST AND UNFAIR COMPETITION

3.1

Fair competition is a fundamental principle of free enterprise and is fully supported by medmix. Therefore, medmix requires full compliance with applicable antitrust and competition laws, which among others include laws prohibiting unfair trade practices and restraints of trade (collectively, "Antitrust Laws").

3.2

All employees of medmix must abide by all applicable Antitrust Laws, irrespective of whether enacted by a supranational, national or local body, and must not engage in any anti-competitive practices.

3.3

Antitrust Laws address the business practices with suppliers, customers and competitors. Although Antitrust Laws vary from country to country, they typically address at least the following prohibited actions:

a) Price Fixing Agreement (whether formal or otherwise) with one or several competitor(s) to fix or otherwise affect prices, terms, or conditions of sales.

b) Market/Customer Allocation Agreement (whether formal or otherwise) with one or several competitors to divide up markets and/or customers

c) Bid rigging Agreements (whether formal or otherwise) with one or several competitor(s) to refrain from bidding, to bid at a certain price, or to submit a bid that is known to be less favorable than a competitor's bid.

d) Sharing of sensitive information
Obtaining or providing sensitive information (e.g. relating to current or future prices, profit margins or costs, bids, market shares, distribution practices, terms of sales, production plans) from and or to competitors at meetings of trade, professional associations or elsewhere.

3.4

All agreements with competitors or any third parties which contain clauses which may have a negative effect on competition (e.g. exclusivity, pricing, tie-in, territorial restrictions, price discrimination, non-compete, and exchange of sensitive technical or business information) must be reviewed and approved by an in-house lawyer to ensure legal compliance with the Antitrust Laws.

3.5

If you have any questions regarding compliance with any aspect of the Antitrust Laws please consult our Antitrust/Competition Law Guidelines on the medmix Intranet (see Article 1.3 above) and/or consult an in-house lawyer.

4. CONFLICTS OF INTEREST

4.1

All medmix employees have a duty to ensure that their outside interests do not interfere with their obligations to the Company. Therefore, we should avoid situations in which our own (direct or indirect) personal interests, outside activities, relationships or financial interests conflict or even appear to conflict with the interests of medmix.

4.2

In case of a potential conflict of interest or the appearance of a conflict, you must inform your line manager or the legal department to enable medmix to determine whether a conflict exists and how to best resolve the situation in a fair and transparent manner.

4.3

Examples of Potential Conflicts

a) Family members and close personal relationships: Contracting with a business managed by a close friend or family member.

b) Outside employment/assignments: Acting as a consultant, director or officer to a supplier, customer or competitor of medmix.

c) Significant ownership interests: Being invested in companies which have or seek to have business relations with medmix or which act as competitors of medmix.

4.4

medmix respects potential contractual obligations of its employees with their former employers and refrains from creating conflict of interests.

All medmix employees have a duty to ensure that their outside interests do not interfere with their obligations to the Company.

medmix is committed to providing fair and non-discriminating employment practices which include providing equal employment opportunities in compliance with applicable laws.

5. EMPLOYMENT ISSUES

5.1

medmix is committed to providing fair and non-discriminating employment practices which include providing equal employment opportunities in compliance with applicable laws.

a) medmix respects different cultural backgrounds and is committed to complying with all employment and labor laws including those related to the elimination of all forms of forced and compulsory labor (including child labor) and the prohibition against all forms of discrimination in employment under applicable laws.

b) medmix encourages its employees to balance work, family, and personal development commitments.

c) Hiring and promotion at medmix is based on personal skills, abilities and performance. medmix is firmly committed to diversity and provides equal employment opportunities to all employees without regard to gender, race, color, age, religion, national origin or other discriminatory factors.

d) Employees' complaints are reviewed, investigated and responded to in a timely fashion.

e) medmix fosters open and regular communication between managers and their teams.

5.2

Ideas and inventions created by medmix employees are one of medmix's most important assets which must be safeguarded in every case.

5.3

medmix has adopted a policy of zero tolerance with respect to unlawful employee harassment (including gestures, language and physical contacts) having a sexual, coercive, misusing or exploiting connotation, and requires all employees to follow the rules regarding sexual or other forms of harassment in force in the countries where they work or do business, and to behave with respect.

5.4

It is medmix's policy to create a safe working environment for its employees. Workplace violence, including threats, threatening behavior, intimidation, assaults and similar conduct, will not be tolerated. Any threats or concerns about safety or the safety of others should be immediately reported to the supervisor, human resources manager or the legal department (see Article 1.3 above). Firearms are not permitted on any medmix facility without prior written consent from the supervisor or the human resources department.

5.5

All medmix employees are expected to make judgments in the conduct of their business unimpaired by drugs or alcohol.

Drugs and Alcohol can severely endanger the safety of others and the distribution and use of illegal drugs and alcohol during work is strictly prohibited no matter where the location.

5.6

The wages medmix pays are adequate to the work delivered, and medmix grants the minimum wages prescribed by law.

5.7

To the extent permitted under the applicable law, medmix respects the freedom of association of its employees and their right to collective bargaining within the boundaries of the local law. Representatives of employees are neither favored nor discriminated.

6. BRIBERY, CORRUPTION, BUSINESS ACCOMMODATIONS

medmix strictly forbids paying bribes, irrespective of whether the recipient is a public official or an employee of a private customer.

6.1. General

medmix strictly forbids paying bribes, irrespective of whether the recipient is a public official or an employee of a private customer.

Bribery is broadly defined and understood as a direct or indirect offer or acceptance of any gift, loan, fee, reward or other advantage to or from any person in order to obtain or reward favorable treatment in the conduct of one's business.

6.2. Government Contracts

a) medmix strictly complies with all applicable anti-corruption and anti-bribery rules and strictly prohibits any medmix employee or agent or other third party intermediary from making improper payments, or granting improper advantages to public officials which include all civil servants and officials of government branches or agencies, as well as employees of corporations which are mainly held or controlled by public entities.

b) Sales to federal, state and local government or to companies owned or controlled by a government have strict regulations which must be complied with. Therefore, all responses to bid requests submitted to any government agency or government owned or controlled company must be reviewed by a person familiar with compliance requirements relating to such bids.

c) Care must also be taken not to discuss anything relating to employment arrangements between the Company and any government employees, unless the matter has first been reviewed and approved by the human resources department or the legal department.

6.3 Political Contributions

medmix does not allow making political contributions. The only exception can be made in Switzerland, where any political contribution requires prior approval by the CEO.

6.4 Business Accommodations

Reasonable and limited expenditures for gifts, entertainment, customer travels and living expenses may be allowed, provided they are directly related to the promotion of products or services or the execution of a contract and provided these benefits will not create a conflict of interest for medmix or medmix's business partners, or violate the applicable law or the internal rules of our business partners.

6.5. medmix Anti-Corruption and Anti-Bribery Directive

For further definitions, details and explanations (including those relating to facilitating payments and dealings with third parties) please refer to the relevant policies which are available on the medmix Intranet (see Article 1.3 of this Code).

7. COOPERATION WITH THIRD PARTIES

7.1

All reasonable efforts shall be made to ensure that contracts with third parties involved in the sale of products and or services of medmix, such as consultants, agents and distributors, contain written provisions stating that such third parties undertake to comply with the respective principles contained in this Code.

7.2

Within its organization, medmix strictly applies the laws prohibiting the use of third parties, such as but not limited to agents, consultants or other service providers to circumvent legal

requirements as stipulated in applicable anti-corruption and anti-bribery laws.

7.3

medmix refrains from cooperating with business partners who violate fundamental human rights, such as using forced and compulsory labor or child labor.

7.4

medmix fosters the application of the principles set forth in this Code by its suppliers.

medmix strictly applies the laws prohibiting the use of third parties, such as but not limited to agents, consultants or other service providers to circumvent legal requirements as stipulated in applicable anti-corruption and anti-bribery laws.

8. INTERNATIONAL TRADE RESTRICTIONS AND BOYCOTTS

The ability of medmix to trade in the world market is restricted by regulations issued by various countries and international organizations such as the United Nations. The mere disclosure of technology may be considered an export. It is the policy of medmix to comply fully with the prohibitions and requirements of all applicable international trade

laws and regulations, and all employees involved in these areas should be familiar with the local and international laws and regulations affecting their business. When in doubt, seek advice from the legal department (see Article 1.3 of this Code).

It is the policy of medmix to comply fully with the prohibitions and requirements of all applicable international trade laws and regulations.

9. FRAUD AND THEFT

It is medmix's policy to ensure that incidents of fraud, embezzlement and theft relating to a medmix Company are promptly investigated, reported and, where appropriate, individuals are prosecuted and terminated from employment.

9.1

It is medmix's policy to ensure that incidents of fraud, embezzlement and theft relating to a medmix Company are promptly investigated, reported and, where appropriate, individuals are prosecuted and terminated from employment.

9.2

Any suspected incident should be immediately reported, either to the compliance officer responsible for the Company or to the medmix Compliance Hotline where reports also can be made anonymously. Details about the medmix Compliance Hotline can be found on the medmix Intranet (see Article 1.3 of this Code).

10. INSIDER TRADING

10.1

Insider trading is the trading of a company's, e.g. medmix's, stock or other securities like bonds or stock options by individuals with potential access to non-public information about the company. In most countries, trading by corporate insiders is illegal, if this trading is done in a way that does take advantage of non-public information.

10.2

Inside Information is broadly defined and may for example, relate to

- a) Financial results (i.e. potential profits or losses)
- b) Strategic plans (e.g. acquisitions, strategic alliances, divestitures, mergers)
- c) Product developments
- d) Changes in the capital structure

10.3

medmix respects the right of its employees to engage in investment activities, and it encourages employees to own shares of medmix. However, all employees owe a fiduciary duty to medmix and its shareholders not to trade in shares, derivatives or other securities of medmix or companies potentially affected by the use of such inside information, or disclose such information to another person, before such information has been disclosed to the public. Violating these principles is subject to criminal and civil prosecution.

All employees owe a fiduciary duty not to trade in shares, derivatives or other securities of medmix or companies potentially affected by the use of such inside information, or disclose such information to another person, before such information has been disclosed to the public.

11. ENVIRONMENT, SAFETY AND HEALTH

All employees are responsible to maintain a safe and healthy workplace by following environmental and health and safety rules and practices, and to report accidents, incidents and unsafe equipment, practices and conditions.

11.1

Occupational health and safety is an important topic for medmix, and medmix is fully committed to providing a safe and healthy workplace for its employees. Therefore, medmix strives to decrease the accident frequency as well as the accident severity rates in each Company. All employees are responsible to maintain a safe and healthy workplace by following environmental and health and safety rules and practices, and to report accidents, incidents and unsafe equipment, practices and conditions. All medmix employees are strongly required to observe the health and safety rules of their Company in order to protect themselves as well as others.

11.2

Within medmix, we know and comply with

- a) the local standards of occupational safety and health regulations, or
- b) if local standards are missing or are not sufficient to protect safety and health properly, or if more stringent internal rules exist, with such internal rules, or
- c) if there are no such internal rules, with the respective best international practice principles.

11.3

medmix is committed to designing its products in accordance with applicable industry standards and relevant safety, health and environmental requirements and supports a precautionary approach to environmental challenges, undertakes initiatives to promote greater environmental responsibility and encourages the development and diffusion of environmentally friendly technologies.

11.4

medmix advises its customers with respect to the safe transportation, handling, usage and destruction of medmix products (when necessary) in a safe and environmentally friendly manner.

12. COMPANY ASSETS AND COMPANY RELATED INFORMATION, CONTACTS WITH MEDIA

12.1

Any employee is requested to handle medmix property with care and to protect it from damage, destruction and theft. Confidential medmix information (including but not limited to technical, commercial and legal information) and trade secrets are important corporate assets and merit the same protection as physical assets. All employees must be careful not to disclose such information to unauthorized persons, either within or outside medmix, and must protect the confidentiality of such information from third parties, e.g. customers or suppliers.

12.2

Some examples of confidential information

- a) Technical information about current or planned products and/or processes
- b) Procurement plans, vendor lists or purchase prices
- c) Cost, pricing, marketing or service strategies
- d) Customer data including customer names and addresses and information about customer's dealings with medmix
- e) Non-public earnings reports and other financial reports
- f) Information related to divestitures, mergers and acquisitions

12.3

No employee other than those specifically authorized by medmix (employees' representatives are considered to be authorized with regard to their subject matter) should speak to or answer inquiries from members of the media regarding any matter in respect of or affecting medmix. Contact with the media shall be conducted only by the duly defined spokespersons.

12.4

medmix uses its best endeavors to deliver proper information about its products and services to its customers and other business partners or parties concerned.

All employees must be careful not to disclose confidential information to unauthorized persons, either within or outside medmix, and must protect the confidentiality of such information from third parties, e.g. customers or suppliers.

Compliance is the responsibility of each employee.

13. RESPONSIBILITIES AND CONSEQUENCES OF INFRINGEMENTS OF THIS CODE

13.1

Compliance is the responsibility of each employee.

13.2

medmix expects its employees to report all incidents that in their good faith judgment may involve violations of laws, regulations or ethical values. Such reports should be made through the channels mentioned in Article 1.2 d hereof.

13.3

The Heads of all medmix legal entities are responsible for exercising due diligence to ensure that their respective Company's employees comply with the rules of this Code, as well as the laws relevant for their businesses, and that their employees regularly participate in trainings necessary for their functions.

13.4

medmix is dedicated to building an open working environment and ethical culture where employees are able to develop relationships based on trust and not sanctions. However, when necessary, medmix will not hesitate to take adequate measures, including termination of employments, to ensure the proper implementation of and compliance with this Code, the applicable laws and the respect of ethical principles embodied in our Code.

DECLARATION OF CONSENT

I herewith acknowledge that I have read and understood the medmix Code of Business Conduct. I am committed to adhere to its rules and understand that violations of this Code may lead to disciplinary sanctions, including dismissal.

Place, Date _____

Name of Employee _____
(In printed letters)

Signature of Employee _____



medmix

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