



CODE OF ETHICS AND BUSINESS CONDUCT

OUR VISION, MISSION AND CORE VALUES

VISION

To provide universal access to life-saving hygiene solutions.

MISSION

Breaking the chain of infection to live healthier in an increasingly globalized world.

CORE VALUES

Be helpful, humble and do the right thing

Always strive for exceptional quality

Foster a culture of collaboration

Promote and embrace continuous improvement

Be creative, flexible and adapt to change

OUR CREDO

At the OPHARDT hygiene Group of Companies, we acknowledge the diversity of stakeholders to whom we are accountable, and consider their interests in every decision made.

We believe our primary responsibility is to our partners, medical care professionals and patients, families, and all others who use our products and services. We strive to provide our customers with high quality hygiene solutions that save lives and prevent the spread of disease.

We are responsible to our worldwide employees, and strive to maintain a culture of dignity, integrity and respect. We recognize the value of diversity and believe that all qualified individuals – regardless of gender, race, religion, or any other protected status – must enjoy equal opportunity to develop and grow within the company. We must compensate our employees by offering fair, livable wages and benefits, based on the regions in which we operate. We must be mindful of ways we can support our employees so they can fulfill their responsibilities and reach their maximum potential. We must provide clean, orderly, and safe working conditions at each of our locations, and provide our employees with the training and assistance they need to ensure they possess the knowledge and skills required to perform their jobs safely.

We are responsible to the communities in which we live and work, as well as to the global community as a whole. We seek to enrich the lives of those with whom we have contact, investing in our shared future through projects and initiatives aimed at improving health and well-being, cultivating stronger communities, and fostering a thriving environment.

To live up to our responsibilities, we must continue to research, innovate and experiment with new ideas. We must invest in new equipment and technologies, make sound, ethical business decisions, and comply with all applicable laws and regulations in the regions in which we conduct business. When we operate according to these principles, we can achieve our mission in *breaking the chain of infection* to live healthier in an increasingly globalized world.

A LETTER FROM OUR CEO

OPHARDT hygiene has celebrated many milestones and achievements over the last 55 years. From our humble beginnings in a family garage, to the multi-national company it is today, OPHARDT hygiene continues to evolve as a leader in our field.

Providing the foundation to our success is the trust we have built with our partners and customers over the years – trust in our ability to provide reliable and innovative products and services. In maintaining that trust, the way we conduct business is as important as the products we sell.

We integrate corporate social responsibility into the very core of our business. Our Code of Ethics and Business Conduct provides every employee with the information and resources they need to continue our tradition of integrity and trust, and to stay true to our brand.

We are proud of our what we have been able to accomplish together. In our quest for success we must always assure that our success does not come at the cost of ethical behavior. We acknowledge that being a socially responsible company is a constantly evolving task, and will continue in our efforts to maintain a high standard of ethics and business conduct and foster positive change.

Thank you to everyone who has contributed to the success of our company.



J. Ophardt

TABLE OF CONTENTS

| | |
|--|----|
| OUR VISION, MISSION AND CORE VALUES | 2 |
| OUR CREDO | 3 |
| LETTER FROM THE CEO | 4 |
| ABOUT OUR CODE | 6 |
| WHAT IS THE OPHARDT hygiene CODE OF ETHICS AND BUSINESS CONDUCT AND TO WHOM DOES IT APPLY? HOW TO USE THIS CODE ASKING FOR GUIDANCE AND EXPRESSING CONCERNS | |
| RESPONSIBILITIES | 8 |
| EVERY EMPLOYEE'S RESPONSIBILITY EVERY MANAGER'S RESPONSIBILITY | |
| INSPIRED WORKPLACE | 10 |
| ENSURING WORKPLACE HEALTH & SAFETY PREVENTING VIOLENCE, HARASSMENT & IMPAIRMENT | |
| RESPECT | 12 |
| FOSTERING DIVERSITY & INCLUSION UPHOLDING FAIR EMPLOYMENT PRACTICES | |
| INTEGRITY | 14 |
| PRESERVING PRODUCT INTEGRITY CONDUCTING BUSINESS WITH INTEGRITY | |
| STEWARDSHIP | 16 |
| SAFEGUARDING COMPANY RESOURCES FOSTERING A THRIVING ENVIRONMENT COLLABORATING WITH LOCAL COMMUNITIES | |

ABOUT OUR CODE

WHAT IS THE OPHARDT hygiene CODE OF ETHICS AND BUSINESS CONDUCT?

The OPHARDT hygiene Code of Ethics and Business Conduct (“Code”) provides a framework for us to live up to the values and principles outlined in Our Credo. The Code defines basic requirements for business conduct and serves as a foundation for our Company policies, guidelines and procedures, as well as legal and ethical responsibilities.

TO WHOM DOES IT APPLY?

All worldwide employees of the OPHARDT hygiene Group of Companies are required to comply with the Code, Company policies, and external laws that govern our activities. It is the responsibility of every employee to know and follow the Code.

HOW TO USE THIS CODE

OPHARDT hygiene operates in many countries around the world, with six production facilities located in North America, Europe, and Asia, and a sales team extending beyond our regional facilities. As such, we are subject to a wide variety of cultural practices, laws, regulations, and political systems. As a business and as individuals, we must always respect the laws and regulations in the countries in which we conduct business, while also considering the regional implications of every decision. This Code provides a set of ethical standards to adhere to in cases where there may be a legal “grey area” and discretionary decisions are required.

The Code does not replace any existing policies. This Code aims to provide a framework for OPHARDT hygiene’s policies and standards, and provide transparency to our worldwide employees, partners, and the diversity of stakeholders to whom we are accountable.

The Code is publically available on OPHARDT hygiene’s corporate website. OPHARDT hygiene reserves the right to update or change the Code at any time, with or without notice.

ASKING FOR GUIDANCE & EXPRESSING CONCERNS

Though the Code contains OPHARDT hygiene's core standards, it should not be viewed as an all-encompassing manual, outlining every policy and procedure for every situation. Should a question or concern arise, employees are encouraged to speak with your immediate manager or local Human Resources representative.

OPHARDT hygiene is committed to protecting the rights of individuals, who in good faith, report issues regarding possible violations to laws and regulations, or to this Code. We respect the principles of confidentiality and the presumption of innocence. If a concern is raised, every reasonable precaution will be taken to protect the security of any personal data collected, as well as to avoid unauthorized disclosures or use of this data. Any information collected will only be communicated with the individuals necessary to ensure the concern is handled appropriately to resolve the issue.

Our company ensures our employees a fair process in the case of an investigation. We will not retaliate or permit retaliation against an individual who reports a concern in good faith. Any accusations that are proven to be slanderous or made in bad faith may result in disciplinary actions.



RESPONSIBILITIES

EVERY EMPLOYEE'S RESPONSIBILITY

We measure ourselves not only by our results, but also by how we achieve them. Every decision we make is driven by a commitment to meet the highest possible legal and ethical standards. To fulfill the responsibilities set forth in Our Credo, and to maintain and enhance our company culture and reputation, we rely on our employees to help enforce our Code.

It is the responsibility of every employee to speak up if they become aware of an issue or situation they believe violates, or may lead to a violation of the Code, a Company policy, or the law. OPHARDT hygiene encourages a culture of openness and respect, where employees can raise any genuine concerns they may have without fear of retaliation. Any employee who raises a concern in good faith – using information the individual believes to be accurate at the time – will be protected from retaliation. The normal route for raising questions, concerns or issues is through your operational or functional management, or through your Human Resources Manager.



EVERY MANAGER'S RESPONSIBILITY

Managers hold a special and important responsibility to set an example for our employees and behave in a manner that is consistent with our Code of Ethics and Business Conduct. In addition to the responsibilities set forth for employees, managers must demonstrate ethical behavior in the performance of their duties, and make fair and objective business-based decisions. They must provide resources to help employees understand the Code, as well as other company policies and guidelines, and relevant laws that govern our business activities. They must create an environment that promotes compliance with company policies and encourage employees to raise questions and concerns without fear of retaliation. They must promptly investigate and take seriously any concern raised that would compromise our Code or any laws that govern our business activities. They must fully support investigations and take corrective or preventative action when someone violates the Code, and finally, managers must recognize and reward ethical behaviour.



INSPIRED WORKPLACE

ENSURING WORKPLACE HEALTH & SAFETY

Employees who respect our core values are our company's greatest asset. We will continue to take every reasonable precaution to protect ourselves, our fellow employees, and any external parties that work at or visit our sites, to ensure every individual arrives home safely to their families at the end of each workday. To make sure our employees possess the knowledge and skills required to perform their jobs safely, we provide ongoing training and assistance to promote a healthy and safe workplace for all. All employees are responsible to familiarize themselves with, and follow, any work safety training and information provided.

We recognize that the wellbeing of our employees depends on our ability to realize a healthier and safer workplace. We acknowledge that the key elements of workplace wellness include the physical and cultural environments, as well as the policies, practices, and procedures that guide us in our work. We support our employees in achieving a healthy lifestyle, both at work and at home, by creating and supporting workplace wellness programs and providing additional guidance on available resources.

In order for our company to achieve its goal of providing a healthy and safe work environment, all employees and partners, including outside contractors, must also take responsibility and be accountable for the health and safety of themselves and others around them. We encourage all employees, regardless of role, title or responsibility to take action if they see a situation that could put others at risk.

PREVENTING VIOLENCE, HARASSMENT & IMPAIRMENT

At OPHARDT hygiene, we are committed to promoting a safe workplace for our employees, partners, contractors, customers, and visitors. We train our employees and managers to promote a culture of safety in the workplace. We are committed to providing a workplace free from any form of violence, harassment, or impairment. "Violence" includes intimidation, threats or acts of violence, as well as any other attempt to instill fear in others. Every employee must report concerns immediately to your immediate manager, your local Human Resources representative, or local OPHARDT hygiene security contact if you believe someone is in immediate danger or if you know of or suspect incidents or threats of workplace violence.

We are committed to providing our employees with a harassment-free working environment. "Harassment" is any unwelcome, intimidating, humiliating or offensive conduct that has the potential to interfere with a person's ability to perform his or her work. Harassment may be verbal or physical, and may be done in person or by other means (such as harassing emails or notes). The intent to offend is not required for a joke or action to be considered harassment. For more information, please refer to your local Human Resources representative.

Possessing, consuming or distributing illegal drugs is strictly prohibited. Having a clear mind is a critical tool in making informed decisions and performing job responsibilities safely and effectively. Employees are always expected to use sound judgment while fulfilling their job requirements and while representing the company. Impairment as a result of the use of alcohol or drugs is prohibited in the performance of your job requirements, as impaired judgement can ultimately affect your performance and jeopardize your personal safety and the safety of those who work with you.

RESPECT

FOSTERING DIVERSITY & INCLUSION

OPHARDT hygiene actively creates and supports an environment that is inclusive and diverse. We recruit, hire, and retain the best talent from around the world from a diverse mix of backgrounds, skills and experiences. We recognize that diversity, in all its forms, adds to the creativity and resilience of our business, and provides us with a sustained competitive advantage. We believe it is essential to the success of our business to provide a diverse and inclusive work environment, free from all types of discrimination, where all individuals have the opportunity to further their education, grow within the company, and perform at their highest potential. We value the contributions of our team members and believe that everyone should have an equal opportunity to succeed.



UPHOLDING FAIR EMPLOYMENT PRACTICES

RESPECTING HUMAN RIGHTS

We believe that every individual has the right to be treated with respect and human dignity. As a company, we abide by all applicable employment laws in the markets in which we operate, and assure our employees safe working conditions. We recognize the importance of upholding, respecting, and promoting fundamental human rights within our operations, as well as throughout our supply chain. In working with our suppliers, we will work to achieve greater transparency on human rights and other critical topics across our value chain.

ENSURING FAIR WAGE AND HOUR PRACTICES

We are committed to ensuring that our employees are fairly compensated for their work. OPHARDT hygiene complies with all applicable wage and hour laws in each of the countries in which we operate, including minimum wage, overtime and maximum hour laws.

PREVENTING CHILD LABOUR & FORCED LABOUR

We respect the rights of every individual, and we abide by all applicable laws in the countries and markets in which we operate. We respect and support all applicable laws that establish a minimum age for employment in the pursuit to effectively abolish any instance of child labour worldwide. As OPHARDT hygiene is part of a long, interdependent supply chain, we strive for greater transparency from our suppliers. In conducting business with our Company, we expect our suppliers to share our commitment to the same standards. The exploitation of children, physical punishment or abuse, and involuntary servitude has no place in our operations or the operations of our suppliers.

INTEGRITY

PRESERVING PRODUCT INTEGRITY

ENSURING PRODUCT SAFETY & QUALITY

Product safety and quality sits at the heart of our business, and are guiding principles in every new innovation we bring to the market. We are dedicated to continuing our tradition of product safety, longevity and reliability. Our strict quality controls, in concert with the requirements set by laws, regulations, and our industry, ensure that the highest standards of hygiene are applied at each stage of the manufacturing process - from product development to distribution. Our commitment to these principles provides the foundation of our brand; this foundation has allowed our brand to develop into a market leader in our field. We expect our employees to ensure our expectations for quality and safety are met, as outlined in product specific technical data sheets.

PRACTICING RESPONSIBLE MARKETING

Our brands are found in medical facilities, schools, industrial and distribution workplaces, food processing facilities, restaurants, recreation facilities, airports, and just about anywhere there is a need for proper hand hygiene. We are committed to delivering honest, understandable marketing that complies with all applicable legislation in the markets in which we operate. We are committed to accuracy, transparency and integrity in the marketing, advertisement, and labelling of our products to maintain the trust we have built between our brands, and the partners, customers, and other stakeholders to whom we are accountable.



ENGAGING IN FAIR PURCHASING

In order to bring value to our partners and stakeholders, we must purchase many items necessary to support our work. When making purchases, we strive to act fairly and impartially toward our suppliers, vendors, and other service providers. We integrate social and environmental considerations into our purchasing agreements, and abide by all applicable local, national, and international laws and regulations.

CONDUCTING BUSINESS WITH INTEGRITY

COMPLYING WITH LAWS AND REGULATIONS

OPHARDT hygiene is committed to full compliance with the laws, rules and regulations of the countries in which we operate. We expect our employees to also comply with all applicable laws, rules and regulations when performing their job requirements. Should any concerns arise regarding the possible violation of a law, rule or regulation, employees are responsible for bringing their concern to their supervisor, Human Resources representative, or other applicable parties, as defined in site-specific policies and procedures.

AVOIDING CONFLICTS OF INTEREST

A conflict of interest involves a situation where a personal interest – be it an activity, relationship or business involvement – conflicts or may conflict with the ability of an employee to fulfill his or her job responsibilities. Even the appearance of a conflict of interest can put our company at risk. All employees have a duty to avoid any potential conflicts of interest and act in the best interest of the company. OPHARDT hygiene requires all employees to proactively and promptly disclose any actual or perceived conflicts of interest. Questions about conflicts of interest should be discussed with the employee's manager or Human Resources representative.

PREVENTING BRIBERY, CORRUPTION AND FRAUD

OPHARDT hygiene takes a strong stance against bribery, corruption and fraud, and is committed to complying with all local and internationally applicable laws and ethical standards that prohibit unlawful and unethical business dealings. We expect our employees to obey the law and maintain high ethical standards as stated in our Code of Ethics and Business Conduct. Our employees are prohibited from accepting illegal payments, kickbacks, bribes, and/or any other inappropriate or unlawful offer of items of value that might influence business decisions.

ENGAGING IN FAIR COMPETITION

Competition laws, otherwise known as antitrust laws, are designed to protect competition. They prohibit business conduct which has either the objective or the effect of distorting, restricting, or preventing competition. OPHARDT hygiene supports all efforts to promote and protect competition, and expects all employees to comply with all applicable competition laws.

STEWARDSHIP

SAFEGUARDING COMPANY RESOURCES

PROTECTING INTELLECTUAL PROPERTY

Our intellectual property is an invaluable asset to our company's success. As such, our intellectual property must, at all times, be used carefully and protected from misuse. We expect our employees to protect the intellectual property rights of OPHARDT hygiene and its business partners, and respect the intellectual property rights of third parties. Intellectual property includes our trademarks, brands, logos, copyrights, package designs, inventions, patents, and trade secrets. Any use of our trademarks or other intellectual property by third parties must receive proper authorization and consent prior to use.

Our intellectual property also includes products – written material, graphics, drawing, 3-D renderings, software programs, ideas, etc. – created for OPHARDT hygiene by its employees in whole, or in part, on company time, in connection with your duties, and/or through the use of company resources or information. Any inventions related to our business should be promptly disclosed to our business, so that it may receive the same protection as other intellectual property owned by our company.



PROTECTING CONFIDENTIALITY

OPHARDT hygiene's business activities are dependent on respect, mutual trust and co-operation between our company and our suppliers, partners, coworkers and customers. We protect confidential information and handle all personal information with care. During the course of our work, employees may learn information about OPHARDT hygiene that must be held confidential. "Confidential information" refers to any information that is not available to the general public, learned as a result of working for or with OPHARDT hygiene. Every employee is responsible for the appropriate handling of OPHARDT hygiene's confidential information, as its use might be harmful to our company if disclosed, whether intentionally or not. Obligations of confidentiality remain, both legally and ethically, after your employment with OPHARDT hygiene ends. All copies of materials or devices in your possession that contain confidential information must be returned to OPHARDT hygiene.

SECURING PRIVACY & PERSONAL DATA

In the course of business, we collect and store personal information pertaining to our employees, business partners, customers, and other relevant stakeholder groups. Personal information can include birth dates, addresses, and financial information, among others. When collecting and storing this data, we are obliged to safeguard confidential information, and we are committed to compliance with all local laws, as well as our own Company Privacy policies. Confidential personal information shall only be used for legitimate business activities, and will only be shared with those who are allowed access. Any information that is no longer necessary to retain will be destroyed appropriately.

RESPECTING COMPANY RESOURCES

We trust our employees to respect Company resources. "Company resources" refers to everything that our company owns or uses to conduct business, including OPHARDT hygiene funds, facilities, inventory, intellectual property, communication systems, hardware and software, vehicles, and other equipment. Company resources enable us to effectively perform our job responsibilities, and deliver quality products and services to our customers. When working with, or using company resources, employees are entrusted to safeguard them from loss, damage, theft or improper use.

STEWARDSHIP

FOSTERING A THRIVING ENVIRONMENT

In our commitment to supporting human health and well-being through proper hand hygiene, we also recognize the importance of being good environmental stewards, as human and environmental health goes hand-in-hand. We use compliance with environmental laws and regulations as the minimum bar to which we subscribe. All employees are required to adhere to company-wide sustainability policies, and comply with environmental laws and regulations that relate to our specific work responsibilities.

In addition to complying with all applicable legislation, we are committed to integrating sustainability and environmental considerations into all aspects of our business — from the design and manufacturing of our products, to distribution and disposal at end of useful life. We will continue to work together to maximize efficiency while minimizing our environmental impact. In the interest of preserving the world for generations to come, we will pursue new ideas and innovations to create sustainable value. More information is available on our website at www.ophardt.com.



COLLABORATING WITH LOCAL COMMUNITIES

We recognize the need for a balance between work, personal, and family life, and therefore encourage our employees and partners to be involved in their communities. Local communities are an important stakeholder group to OPHARDT hygiene, and we rely on them for our continued success.

We believe in doing our part to help cultivate resilient communities where we live and work. We seek to strengthen communities by hiring local talent, creating partnerships with local organizations, and supporting local initiatives that better the lives of our fellow community members. We further support the improvement of health and well-being around the world through RESPONSIBILITY e.V., a charity organization founded by OPHARDT hygiene's CEO and a group of OPHARDT hygiene employees. The goal of the RESPONSIBILITY Club is to become active participants in social responsibility by implementing tangible solutions that address quality of life and health in underdeveloped communities. RESPONSIBILITY aims to achieve this goal by promoting good hygiene, cultivating infection prevention, and providing much-needed equipment for facilities like hospitals, retirement homes, or schools.

While representing the company, we will not impose our personal beliefs or opinions on other partners or community members. We seek to foster a culture of respect and open-mindedness within the community.





Thank you for your consideration of OPHARDT hygiene.
Come visit us, meet our people and learn more about our
company and our shared values.

www.ophardt.com