

## Code of Conduct

### Contents

Preamble.....	2
1. Scope.....	2
2. General principles, responsibility.....	2
3. Human rights / equal opportunities / diversity / inclusion.....	2
4. Quality and safety of our services/occupational health and safety.....	3
5. Medical services.....	3
6. Remuneration / billing of medical services.....	3
7. Malpractice.....	4
8. Research services.....	4
9. Avoidance of conflicts between private and business interests.....	4
10. Awarding of contracts.....	4
11. Non-cash benefits / gifts and entertainment / invitations.....	4
12. Donations / sponsoring.....	4
13. Labour law.....	4
14. Confidentiality / data protection.....	4
15. Secrecy / handling of business secrets.....	5
16. Ownership / possession of the UKW.....	5
17. Communication with the public.....	5
18. Ecological responsibility.....	5
19. Rules for compliance with the Code of Conduct in everyday business.....	6
20. Reporting Violations.....	6
21. Compliance Officer.....	6
22. Processing of notifications.....	6
23. Entry into force.....	7

## Preamble

In 2015, the Executive Board of the University Hospital of Würzburg (UKW) decided to establish a compliance management system in awareness of its responsibility to comply with legal provisions and internal regulations.

This updated Code of Conduct forms the basis of this compliance management system. It formulates the essential rules and principles for legally correct and responsible behaviour on the part of all employees. In addition, based on the UKW mission statement, it reflects the values that are of particular importance to the UKW with its tasks in patient care and beyond, and especially as a university research institution.

All employees are called upon to check their own behaviour against the standards of this Code of Conduct and to ensure that these standards are always adhered to.

### 1. Scope

The Code of Conduct contains the most important rules and principles of behaviour for all employees of the UKW. The term "employees" also includes staff working at the hospital whose employer or employer is the Free State of Bavaria; it also includes managers. The Code of Conduct serves to make employees aware of the fundamental and indispensable ethical and legal requirements that they must fulfil in the course of their work.

Special regulations in laws, ordinances, collective agreements or internal regulations etc. remain unaffected.

### 2. General principles, responsibility

All employees must comply with the external regulations applicable in their working environment, such as laws and ordinances as well as other regulations. This also includes collective agreements and internal regulations such as service agreements, service and procedural instructions and other internal guidelines; internal regulations also include this Code of Conduct.

Each and every employee is responsible for complying with these regulations. All managers must ensure that their employees are familiar with the applicable regulations and comply with them.

Any involvement in actions that are clearly aimed at circumventing external regulations or internal rules is not permitted.

All employees are obliged to regularly inform themselves about the external requirements and internal regulations applicable to their area of activity.

Employees are also required to behave honestly, fairly, with integrity, reliably and trustworthily at all times. Furthermore, they should also take care not to damage the reputation of the UKW in their private lives.

In this respect, every employee is responsible for the long-term success of the UKW.

Violations of external regulations or internal rules may result in labour law measures up to and including termination of the employment relationship and criminal sanctions. Ignorance is generally no excuse for misconduct and does not protect against sanctions.

### 3. Human rights / equal opportunities / diversity / inclusion

The UKW is committed to respecting internationally recognised human rights and opposes all negative impacts that are triggered by its business activities and with which the UKW could be associated through its activities as a company.

The UKW offers an inclusive working and learning environment, promotes diversity and combats all forms of discrimination - regardless of whether it is directed against patients, business partners, colleagues or students. Insults and harassment, particularly of a sexual nature, are also fundamentally discriminatory. Any form of abuse of power, coercion and violence or the threat thereof will also not be tolerated.

All employees are required to familiarise themselves with the UKW's policy statement on human rights and to comply with the applicable human rights laws and regulations. Cultural differences must be dealt with respectfully in everyday working life; inappropriate remarks and offensive messages must be avoided.

#### **4. Quality and safety of our services/occupational health and safety**

We strive for the best possible quality and safety of our services. All employees are responsible for this. Laws, guidelines and standards on safety, fire protection, occupational safety and quality must be consistently observed. This applies in particular to services in diagnostics and therapy for our patients, but also for employees in the research areas of the UKW.

In particular, employees may only appear at their workplace/office if they are fit for work or duty. Severe fatigue, alcoholisation or the use of intoxicants are not compatible with this. Express reference is made to the service instruction of 27.08.2020 in this regard.

If employees believe, on the basis of concrete evidence, that safety or occupational health and safety at work is not sufficiently guaranteed, the following persons/institutions are available as contacts:

- the immediate superior or, if this is not possible due to the circumstances to be reported, the next higher superior up to the hospital management board,
- the responsible office in the administrative area (in particular Division 2 - Human Resources, the Employee Counselling Centre, the Medical Safety Unit and the company doctor),
- the Medical Director as the superior of the scientific staff,
- the Commercial Director as the superior of the non-scientific staff, and
- the UKW reporting office (see no. 20).

#### **5. Medical services**

Medical services may only be provided by the responsible and appropriately qualified specialist staff. The "specialist physician standards" must be strictly complied with.

Also to be complied with are the legal and internal hygiene provisions as well as the provisions of the Medical Device Law, the Infection Protection Act and comparable provisions for protecting patients and personnel.

Restricting patients' freedom is only permitted under strict compliance with internal standards that are strictly oriented to the legal provisions as well as the principle of proportionality.

The Hospital considers it to be reasonable and appropriate to collaborate with external hospitals and practitioners to promote optimized patient care. However, such collaborations must comply with the legal and internal provisions. For example, the prohibition on referring patients in exchange for compensation must absolutely be observed.

#### **6. Remuneration / billing of medical services**

The requirements of correctness and transparency demand that all documentation, accounting and data recording must be complete, correct and accurate. The relevant data must be prepared on time and must comply with legal or contractual requirements.

The statutory and professional regulations must always be complied with when remunerating and invoicing services. Private medical services are provided and invoiced in compliance with the requirements for the personal obligation to provide services.

## **7. Malpractice**

The University Hospital has also set the goal of treating patients and/or their relatives fairly even in connection with cases of actual or alleged malpractice. In implementing the requirements of the Patients' Rights Act, various internal provisions were created, such as a manual for informing physicians and a manual regarding documentation of hospital treatment, whose specifications are to be followed by all employees who work in the area of patient care.

## **8. Research services**

Research services must correspond strictly to the legal provisions, general scientific standards and specific university requirements in order to ensure the protection of study patients and test subjects, as well as the protection of staff (e.g. copyright regulations, inventor rights).

For research involving third-party funds, particular attention must be paid to the balance between service and compensation in order to ensure the independence of the research.

## **9. Avoidance of conflicts between private and business interests**

Business activity must always be in the best interests of the UKW. Employees must avoid situations in which their own personal interests, (including financial interests) or those of people near to them collide with the UKW interests. Employees must report equity interests in business partners and competitors in writing to the line manager; The same applies to equity participations of people near to them. This notification obligation does not apply to the acquisition of marketable assets.

In situations in which a related person has a management function, the instructions for the management of related persons must be observed.

## **10. Awarding of contracts**

The University Hospital has a considerable economic impact far beyond the region. It is therefore of particular importance to preserve business neutrality when awarding orders to external business partners. The current versions of the relevant legal provisions for awarding orders as well as the internal procurement provisions of the University Hospital of Würzburg must therefore be strictly complied with.

## **11. Non-cash benefits / gifts and entertainment / invitations**

Non-cash benefits or gifts may only be accepted when they are of little value and they are accepted freely without any expectation of quid pro quo. Details can be found in the UKW's Anti-Corruption Directive.

## **12. Donations / sponsoring**

With regard to all donations and sponsoring arrangements, care must be taken that the legal and internal provisions are observed. The Hospital only accepts donations voluntarily and without any expectation of quid pro quo. The requirements for approval of donations, complete documentation and tax deductibility must be observed.

## **13. Labour law**

As an employer, it is of particular importance for the UKW to comply with legal provisions, labour agreements and internal labour law provisions.

## **14. Confidentiality / data protection**

The protection of personal data, strict observance of confidentiality and compliance with applicable external and internal data protection regulations such as the UKW Data Protection Directive are essential foundations of our actions.

Personal data, in particular patient-related data, which are not intended for access by third parties, must be protected against misuse. When handling personal data, employees, patients and business partners must be protected against impairment of their fundamental rights. Personal data may only be processed insofar as this is necessary for the legitimate performance of tasks and a legal basis permits this.

### **15. Secrecy / handling of business secrets**

All employees are bound to secrecy regarding all confidential matters of the UKW.

Confidential information is all information that is labelled as such or that is not assumed to be public knowledge and is not intended to be made public. Confidential information about the UKW may not be passed on to outsiders or employees who are not involved.

All employees must handle business secrets responsibly and must not use them to gain an economic advantage for themselves or others. All confidential information must be protected from unauthorised access by third parties. It must also be ensured internally that this information is only passed on to those employees who need it to carry out their work.

### **16. Ownership / possession of the UKW**

The property and possessions of the UKW must be protected in particular against loss, damage and theft. Property includes not only tangible assets, but also intangible assets such as intellectual property, software, etc.

All employees are responsible for the protection of UKW's property and possessions. Property, possessions and other assets of UKW may only be used for the intended business purposes. Use for other, in particular personal, illegal or otherwise impermissible purposes is not permitted. Infringements may, among other things, fulfil the criminal offences of theft or embezzlement and in this case will be reported by the hospital to the competent law enforcement authorities. Official resources and equipment (e.g. telephones, PCs, internet, company smartphones or tablets, company vehicles, company e-bikes, etc.) may only be used for private purposes if this is explicitly permitted.

### **17. Communication with the public**

All announcements made by the University Hospital must be complete, honest, accurate, timely and comprehensible. The UKW respects the professional independence of journalists and the media and does not pay for editorial contributions.

Official statements and communication with the public on behalf of the UKW may only be made by the Medical Director (MD) or the Communications Unit. Other employees may not independently answer questions or issue information on behalf of the UKW without permission from MD or the Communications Unit. This does not apply to scientists who are addressed in their capacity as experts.

### **18. Ecological responsibility**

Sustainable environmental and climate protection and resource efficiency are important corporate goals for UKW. We comply with all legal requirements relating to the environment and sustainability and ensure that all impacts on the environment and climate caused by UKW are minimised as far as possible. Each and every employee has a responsibility to treat natural resources with care and to contribute to the protection of the environment and climate through their individual behaviour.

We endeavour to reduce or avoid the use and consumption of resources and the generation of all types of waste, including water and energy.

The UKW maintains energy consumption and continuously works to improve energy efficiency and reduce energy consumption.

## 19. Rules for compliance with the Code of Conduct in everyday business

The rules of the Code of Conduct cannot conclusively regulate the wide variety of behaviour of UKW employees. All employees must therefore constantly ask themselves the following questions about their own behaviour in everyday business:

- Are the decisions and the resulting actions legally and ethically correct?
- Does the behaviour comply with the principles and internal guidelines of the UKW?
- Is action free from personal interests that conflict with the interests of the company?
- How is public behaviour assessed when, for example, the press reports on it?
- Can the effects of the behaviour damage the reputation of UKW?

All employees must be aware that they harm themselves and the UKW if they act unlawfully or violate internal guidelines. Even short-term economic success does not justify the violation of long-term corporate principles.

## 20. Reporting Violations

If employees become aware of a violation of external regulations or internal rules, they are required to report this violation immediately.

The following persons/institutions are available as contact persons:

- the immediate superior or, if this is not possible due to the circumstances to be reported, the next higher superior up to the hospital management board,
- the responsible office in the administrative area (hospital administration, staff departments of the Executive Board, central facilities),
- the Equal Opportunities Officer, the contact persons for people who have experienced sexual harassment or sexualised violence, the contact person for anti-discrimination,
- the Medical Director as the superior of the scientific staff,
- the Commercial Director as the superior of the non-scientific staff, and
- the UKW internal reporting office.

The internal reporting office treats all reports, including those relating to breaches of the Code of Conduct, in strict confidence in accordance with Sections 8 and 9 of the German Act for the Better Protection of Whistleblowers (Hinweisgeberschutzgesetz - HinSchG).

Notes do not constitute denunciation, but are intended to enable the UKW to react to possible offences in good time, to remedy them or to prevent them in the future.

## 21. Compliance Officer

The Compliance Officers appointed by the hospital's Executive Board oversee the reporting office in accordance with Section 12 HinSchG.

The establishment of the Code of Conduct, including the Compliance Officers, does not release the departments that are originally responsible for the topics specified in the Code of Conduct from their own professional responsibility. Routine or policy advice is also not part of the remit of the Compliance Officers.

## 22. Processing of notifications

The compliance officers also observe the legal requirements of the HinSchG when reporting violations of the Code of Conduct. They are independent in the performance of their duties (Section 15 (1) sentence 1 HinSchG)

To assess the reports, the Compliance Officers may, at their own discretion, make use of other units within the UKW, such as the Legal department; these units must provide the assistance required by the Compliance Officers.

### **23. Entry into force**

The updated Code of Conduct comes into force upon signing. It replaces the previous Code of Conduct from 2015.

Würzburg, 20.01.2025

signed by

PD Dr. Tim von Oertzen

Medical Director

signed by

Philip Rieger

Commercial Director