

Clinical Code of Conduct

Updated February 17, 2025

Table of Content

01. General scope of application	2
02. Interaction with patients	3
02.01. Information and clarification.....	3
02.02. Careful treatment and self-determination.....	3
02.03. Dignity and privacy.....	4
02.04. Confidential information and data protection.....	4
03. Behavior and action of the medical staff	5
03.01. Communication with patients.....	5
03.02. Professional responsibilities.....	5
04. Quality management	6
04.01. Quality standards, safety and hygiene.....	6
04.02. Medical processes.....	7
04.03. Storage of medicines.....	7
05. Interaction with suppliers and referring physicians	8
05.01. Conflicts of interest.....	8
05.02. Referrals.....	8
05.03. Acceptance of gifts and hospitality.....	8
05.04. Documentation and invoicing.....	9
06. Whistleblowing & complaint systems	9

01. General scope of application

The MEDISTYLE is committed to comply with ethical standards towards its employees and business partners as described in the MEDISTYLE's Code of Conduct.

MEDISTYLE's corporate culture is legally compliant and is to be practiced in an ethically impeccable manner. MEDISTYLE not only attaches importance to generating results but also to how they are achieved.

Working in a clinical environment imposes further requirements and responsibilities on the company above and beyond those contained in the MEDISTYLE Code of Conduct designed to apply to the general business environment. For this reason, the MEDISTYLE Clinical Code of Conduct was developed.

The MEDISTYLE Clinical Code of Conduct is designed to complement the MEDISTYLE Code of Conduct and applies throughout the world to:

- the entire medical staff such as nursing staff, therapeutic staff as well as all employees of the MEDISTYLE who are in contact with patients or provide services on their behalf (personal scope) as well as
- MEDISTYLE subsidiaries and the healthcare facilities managed by MEDISTYLE e.g. via operating and management contracts (material scope).

This MEDISTYLE Clinical Code of Conduct does not include a complete set of rules and regulations covering all applicable laws, guidelines and standards. If any stipulation contained in this MEDISTYLE Clinical Code of Conduct deviates from applicable legal regulations it is essential to comply with the respective provision which, on the one hand, is in accordance with the currently valid body of laws, and on the other hand, is more demanding with respect to the ethical and medical principles MEDISTYLE adheres to.

The staff of the MEDISTYLE is:

- obliged to support and apply the principles specified in the MEDISTYLE Clinical Code of Conduct in their everyday working life,
- required to adhere to the stipulations contained in the MEDISTYLE Clinical Code of Conduct,
- responsible for reporting suspected violations of the MEDISTYLE Clinical Code of Conduct,
- obliged to take part in compliance trainings (e.g. e-learning).



The executives of the MEDISTYLE are required to ensure that the staff is familiar with the contents of this MEDISTYLE Clinical Code of Conduct and further regulations contained in the MEDISTYLE Code of Conduct and that the valid rules are complied with.

02. Interaction with patients

All decisions and actions must be measured by whether or not and to what extent they serve the well-being and safety of patients.

Patients have special legal rights when they make use of healthcare services. The respective legal regulations are to be complied with in accordance with the respective national laws. However, in principle, the following applies to all MEDISTYLE facilities.

02.01. Information and clarification

Patients have the right to be appropriately informed and made aware of diagnoses, therapies and medical measures.

This clarification must take place in a manner which is understandable to the people concerned and must include information about possible therapy options. The right of the patient to view his or her patient records must be ensured.

02.02. Careful treatment and self-determination

There is no guarantee of success in the medical profession when it comes to curing a disease.

Nevertheless, patients have the right to carefully implemented treatment and care in line with the latest scientific findings or recognized methods without the use of physical or psychological violence. The right to self-determination must be respected i.e. respective patients may only be treated with their express approval (Declaration of Consent). A Patient Decree must be respected.



02.03. Dignity and privacy

The care of patients is to be carried out in a considerate manner, respecting their personal values and beliefs and supporting personal freedom.

Treatment is to be provided without distinctions being made as to a person's age, gender, origin, religion, wealth, the type and cause of the illness etc. (principle of non-discrimination).

The needs of the patient with respect to privacy are respected. Information about patients is considered to be confidential and must be protected against loss or misuse in accordance with applicable data protection regulations.

02.04. Confidential information and data protection

Special protection is granted to safeguard the relationship of trust between patients and the healthcare facility entrusted with caring for them.

Patient data is to be handled in a strictly confidential manner in accordance with the relevant applicable legal regulations. It is not permitted to read patient data when this is not required within the context of the work to be done.

The dissemination of data and enabling third parties to gain access to data is only permissible within the framework of legal provisions or with the approval of the patient.



03. Behavior and action of the medical staff

The medical staff must behave respectfully towards patients. Appropriate care must be exercised in all activities involved in treating and taking care of patients in accordance with relevant national legislation.

03.01. Communication with patients

In talking with patients, it is essential:

- to plan a sufficient amount of time,
- to use clear, understandable language,
- to create a level of trust in an atmosphere free from accusation,
- to respect their opinion,
- not to dominate the discussion as a doctor,
- to do everything possible to avoid any disturbances,
- to take account of all relevant information e.g. living conditions.

Questioning the patients is designed to make sure that they understand the information. Agreements concluded with patients during the discussions must be upheld.

03.02. Professional responsibilities

Medical treatment must be carried out in line with the latest scientific findings and by weighing the benefits and risks (e.g. side effects of drugs). In case of doubt, a second expert opinion is warranted.

Medical staff, nursing staff as well as therapeutic staff are only allowed to perform medical services which they are proficient in and for which they are (legally) authorized. Regular training ensures up-to-date medical knowledge.

The treatment of patients must be precisely documented and kept confidential in line with the applicable data protection regulations. The proper handover to subsequent practitioners must be ensured.

Interdisciplinary and cross-hierarchical cooperation is necessary in the treatment of patients. In the process, a team culture should be developed and promoted.



04. Quality management

In the field of healthcare, the acquisition and exchange of knowledge is crucial for the quality of medical services or all services rendered on behalf of patients. MEDISTYLE can only achieve its objectives and meet its quality standards with qualified and motivated employees.

MEDISTYLE's extensive offerings enable the company to maintain and enhance the high level of expertise and qualifications of all employees. Annual employee appraisals are the basis for the individually tailored qualification measures targeting employees. Legal requirements for further education and professional development are always complied with. This especially includes the regular training for the use of medical equipment. Employees play an active role in planning their training.

To ensure the quality of medical services and all other services, patient satisfaction at MEDISTYLE healthcare facilities is surveyed using various methods. This allows potential for improvement to be identified and exploited.

04.01. Quality standards, safety and hygiene

MEDISTYLE's medical facilities and clinical departments are in accordance with relevant international quality standards or strive to be granted such certifications.

Examples of medical quality standards:

- JCI - Joint Commission International
- KTQ - Cooperation for Transparency and Quality
- EN 15224 - Quality Management System in Healthcare
- E-QALIN - Quality Management System in the Care Sector
- ISO 9001 – Quality Management System (general)

The MEDISTYLE Clinical Code of Conduct must be taken into account when implementing these quality standards. Any incompatibilities are to be reported to the responsible Officer.

MEDISTYLE is aware of the significance and challenge of infections in connection with operating medical facilities and clinical departments. MEDISTYLE takes the issues of safety and hygiene very seriously and sends employees to participate in numerous working groups and networks focusing on safety and hygiene in healthcare facilities. We constantly work on further developing awareness-building and prevention measures. Employees are required to resolutely adhere to legal and internal regulations on safety and hygiene standards.



04.02. Medical processes

Clearly defined clinical pathways must be set up and adhered to for every treatment (therapy). These clinical pathways are to be steadily further developed and adapted to the particular needs of the patient within the context of an individual treatment plan.

In any case, it is essential to specify and document:

- the admission process,
- the medical treatment process,
- the discharge processes.

04.03. Storage of medicines

The proper storage of medicines is essential. The storage conditions (e.g. light protection, temperature, hygiene) prescribed by the product manufacturer as well as the valid legal regulations applicable to the storage of medicines must be strictly complied with.

It must be ensured at all times that unauthorized persons do not gain access to medication. This can be effectively done by means of suitable organizational measures and technical systems.

Responsibility for compliance with all valid laws and regulations with respect to storing pharmaceuticals is in the hands of the person in charge of relevant activities and operations.



05. Interaction with suppliers and referring physicians

05.01. Conflicts of interest

A conflict of interest can arise if personal interests, particularly of a financial nature, or other personal activities of the employees are influencing or could influence the employees ability to make objective decisions within the context of their professional obligations.

MEDISTYLE employees, especially the medical personnel, are expected to avoid situations in which their personal interests are in conflict with the interests of the company or those of patients. Every situation in which a MEDISTYLE employee financially or personally profits or could profit due to his position within the MEDISTYLE or a person associated with him represents a conflict of interest. It is prohibited to accept such financial or personal advantages.

By disclosing secondary activities and cooperation with external partners or other third parties, potential conflicts of interest are identified. Such conflicts of interest are to be documented and assessed as well as measures taken to resolve these conflicts. The transparency gained in this manner serves as the basis for demonstrably making independent and exclusively objective, quality-driven decisions. Conflicts of interest must be promptly reported to the responsible Officer.

05.02. Referrals

Referrals from medical staff must only be based on medical findings and the treatment requirements of the patients and under no circumstances as a favor or due to other advantages granted to the referring medical staff.

05.03. Acceptance of gifts and hospitality

Medical staff is not permitted to accept any inappropriate gifts and hospitality.

Gifts and hospitality (even of a low value) are inappropriate in any case if they are directly or indirectly connected with the prescription of medicines or acquisition of medical products.

Invitations/training courses/hospitality may only be accepted if all the following prerequisites are fulfilled:

- Events of an informative nature or those involving training in the field of medicine/healthcare and the professional field of work of the respective employee.
- The location as well as the predominant part of the event correspond to the scientific objective, purpose of the training or the practical application of medical treatment.



- Reimbursement for travel costs or accommodations, appropriate hospitality and an appropriate fee for active participation are permissible.

Events characterized by a considerable share of entertainment as well as reimbursement of costs for accompanying persons are not permissible.

05.04. Documentation and invoicing

Agreements, especially those with payers and suppliers, are to be concluded in writing in compliance with all valid legal regulations.

All documentation, invoicing and data compilation must be complete, timely and in accordance with legal stipulations as well as existing requirements for the MEDISTYLE.

06. Whistleblowing & complaint systems

MEDISTYLE offers its employees, business partners and their employees, competitors and other stakeholders various channels to report possible violations of this Code.

All employees are free to report possible (past) violations or imminent violations of this Code to their supervisors or the Officer responsible for them.

Employees who report a possible violation in good faith (i.e. who have good reason to believe that their information is true) must not be disadvantaged in any way. However, employees who recklessly or knowingly make false suspicions or accusations shall face consequences.

Furthermore, a MEDISTYLE's officer is available to employees as well as to all persons outside the company, in particular business partners and their employees, MEDISTYLE's competitors and other stakeholders, to whom possible violations can be reported and with whom confidential communication with the whistleblowers or complainants is ensured.

In addition, to report a possible violation all whistleblowers are free to contact the Chief Officer of the MEDISTYLE directly or to send an anonymous letter.

