



Code of Conduct PAX





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1 Introduction

Founded in the year 2000, X-CEN-TEK GmbH & Co. KG has become a leading manufacturer and supplier of first aid, wound care and emergency care solutions.

We strive to offer solutions for emergency backpacks, emergency bags, vacuum products, products for rescue and transport, and as a certified manufacturer of medical devices.

We set out to achieve these goals with our reliable and innovative high-performance products, long-standing relationships with our customers, the close cooperation with our partners, and by sharing our knowledge and experience.

The PAX Code of Conduct bundles the essential principles and rules, defines the targets we have set for ourselves, and serves as guideline for our decisions and actions.

It also defines the compulsory minimum standard for our conduct within the company, as well as with business partners and the public.

Collectively all of us are responsible for the reputation of our company and accept this Code of Conduct as a guiding light for our daily lives.

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2 Legal compliance

We observe the relevant laws as they apply on local, national and international level.

This has been a reliable hallmark of our company ever since and is applied stringently, even if it entails economic disadvantages or difficulties. In cases where the relevant laws conflict with the rules laid out in our Code of Conduct, we insist on applying the more strict requirements.

All employees are obliged to know the fundamental laws, regulations and company policies relevant to them and to abide by them. Compliance is therefore the responsibility of every single one of us. We in particular expect profound knowledge from our managerial staff, whose position bestows upon them a special degree of responsibility for compliance.

They act as role models, bring our Code of Conduct to life and assure its observance by the company's staff members.

Any breach of the Code of Conduct or legal violations must be reported to the respective line manager.

Employees who feel anxious about sharing information with their direct supervisor may also contact the Management Board on a confidential basis.

Observations in connection with a crime must be reported as evidence.

Employees who share information in good faith must not be exposed to or threatened with negative consequences. A climate of open communications contributes to preventing further transgressions and allow for corrective action to be taken at an early stage. Information about suspected transgressions are treated confidential and will be investigated fairly and without prejudice.

Depending on the severity, violations may not only ensue disciplinary and liability consequences, but also lead to criminal prosecution.

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3 Conduct with business partners and others

As our company is one of many competing in the markets for the best materials, employees and product sales, we are committed to observing the laws and regulations aimed at protecting a fair competitive environment.

All employees and business partners are obliged to assure that advantages are not obtained by resorting to unlawful actions.

We do not tolerate price fixing, collusion to secretly promise geographical territories, customers or procurement sources, fraudulent agreements with regard to tender bids or other anti-competitive actions and unfair competition practices. We are firmly committed to the principle of fair market competition.

We expect our business partners to conform and align with our values, observe the laws, not engage in corruption, uphold the universal human rights and labour laws - including those against child labour - and take steps to protect the environment, the safety of their products and their healthiness, as well as the wellbeing of animals and to impose corresponding requirements along their own delivery chains while assuring compliance by means of suitable measures.

Where contracts are awarded on the basis of a formal tender process, our company will abstain from coordinating its offers with other bidders.

This applies irrespective of whether the tender process is a private or public opportunity.

We are expressly opposed to any form of corruption in all countries and object against unethical business practices that may influence commercial decisions.

Our employees are prohibited from utilising our business relationships for the benefit of themselves or others, or to inflict harm or damage on our company.

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3 Conduct with business partners and others

They are prohibited from granting or accepting any undue private benefits, e.g. in the form of money, non-cash benefits or services, that may influence a decision.

All employees are obliged to report any suspicion of corruption or white-collar crime.

Invitations to events like business lunches or alike that fall within local business customs are only acceptable if they do not serve the purpose of gaining an undue advantage or benefit.

In cases of doubt with respect to a legitimate reason or the customary nature of an event or benefit, employees are obliged to consult with their line managers.

The involvement of consultants and other agents must not be abused to circumvent the prohibition of bribery.

Donations are only permitted on a voluntary basis and without the expectation of a return benefit or performance. All donations must be completely transparent. The recipient and concrete purpose of all donations must be known.

Information about the cause behind the donation and its purpose must be available upon request at all times.

We do not make donations to political organizations or parties. We follow a zero-tolerance approach to money laundering.

All employees are obliged to strict observance of the anti-money laundering laws.

They are also required to immediately report any suspicious payments or other transactions.

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4 Preventing conflicts of interest

A conflict of interest arises whenever business interests are influenced by private interests.

To prevent even the appearance of a conflict of interest, all employees are obliged to keep their private interests separate from their work and make decisions free from bias and always in the best interest of the company.

5 Personal wellbeing and human rights

We support and obey the universal human rights.

Our employees conduct themselves with mutual respect, trust, tolerance and fairness in all their dealings with others, both within our company as well as with business partners.

They respect every single person's dignity, privacy and personal rights.

We denounce all forms of forced labour, child labour and slavery.

We hire our staff in strict compliance with the statutory minimum working age.

We do not tolerate any discrimination on the basis of a person's age, political or religious views, disability, trade union affiliation, gender, skin colour, social and ethnic origin, sexual orientation or nationality.

Our employees respect and protect the personal dignity of all others they cross path with.

They will not tolerate discrimination or harassment of colleagues or others.



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6 Occupational health and safety, environmental protection

We duly implement the relevant laws and standards for a safe work environment and take the measures necessary to satisfy our obligations.

All employees are tasked with avoiding risks to humans and the natural environment, to keep their environmental footprint as small as possible, and to conserve resources wherever they can.

We take concrete action to assure that our processes, facilities and equipment are aligned with the relevant statutory and internal regulations pertaining to occupational health and safety and environmental protection.

7 Quality management

Our product safety and quality standards are one of our top priorities.

It is therefore imperative that all relevant quality assurance requirements are observed.

This encompasses the statutory regulations and requirements as well as internal quality assurance measures.

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8 Safeguarding confidential information

Secret business information and data must be treated with absolute confidentiality.

Sensitive information of any kind must never be used for own interests or made accessible to third parties.

This level of confidentiality also extends to the information we are entrusted with by our business partners. Vice versa, we impose the reciprocal obligation to confidentiality on our suppliers and other business partners.

9 Data protection

The protection of personal data - in particular the data of employees, customers and suppliers - is always one of our highest priorities.

Personal data is never collected, processed or disclosed without a legitimate legal basis or the consent of the respective data subject.

10 Company property

All employees are expected and required to exercise due care, responsibility and cost-consciousness when handling company property.

The property of the company must not be used for private purposes without the company's consent.

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11 Compliance with the Code of Conduct

We familiarise our staff members with the content and meaning of this Code of Conduct and explain the obligations that flow from it to them.

The principles formulated in this Code of Conduct are also effectively communicated to our business partners.

The Code further lays out a set of binding rules with respect to each employee's personal conduct. These rules must be observed strictly and consistently.

The fundamental values and objectives are implemented by way of suitable organisational measures, as well as by expedient corporate policies and processes in all business units.

Compliance with the Code of Conduct is enforced and audited regularly.



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