

# Temos International GmbH

## Code of Ethics

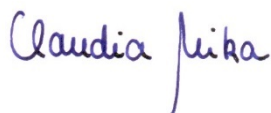
Dear colleagues,

Thank you for your continuous support, contributions and trust in Temos International! We all know that the ability of Temos International to achieve its mission and vision requires that we continuously strive to keep our reputation for integrity that we have earned since our foundation in 2010.

Our partners, customers and stakeholders expect us to operate to a high ethical standard. Our business ethics as well as our personal conduct must always reflect the Temos International values, demonstrate professionalism and ethical leadership and uphold our reputation for integrity while adopting the behaviors of a safety culture. As a company, we need to have safeguarding measures in place, such as a robust governance structure and management system. Our Code of Ethics clarifies what is expected from all of us on an individual level.

You represent Temos International. You need to know the Code of Ethics and act in line with it. The code is ours and we all have our responsibility within Temos International, and wherever we are.

Sincerely,



**Dr. Claudia Mika**  
Founder & CEO  
Temos International



## 1. Introduction

Temos International has committed to high ethical standards and values. Employees, assessors and contractors are expected to act ethically and impartially in the long-term interest of our company, our customers and partners, and the society.

We always strive to maintain our reputation and achieve our mission, and we conduct our activities in a way that is truly compliant with our professional, legal, and ethical responsibilities. This Code of Ethics is not an exhaustive guide covering every situation. Instead it outlines high-level principles in two main areas: firstly, Temos International's conduct of its business and secondly, the personal conduct of people involved in the business of Temos International in every day work situations and in case where there are challenges to their personal or professional integrity. Thus, this Code of Ethics contains principles which articulate the broad policy goals of Temos International and standards which set forth specific measures to guide our day-to-day work, the behavior of staff, assessors, external contractors, suppliers and consultants cooperating with Temos International.

Temos International is committed to the United Nations Global Compact, the world's largest corporate sustainability initiative (<https://www.unglobalcompact.org/>) and to adhering to its principles in the areas of human rights, labor, environment and anti-corruption in our business strategy, daily operations and company culture.

## 2. Scope

The scope of the Code of Ethics extends beyond its statutory basis as a code of practice.

The expectation of our partners, customers and external contractors is that every person working for Temos International will adopt the Code of Ethics. This includes all those engaged on a permanent, temporary, full-time, part-time, casual, consultancy, contracted or voluntary basis.

This document is reviewed bi-annually to evaluate if it keeps its validity or needs adjustment based on recent experience.

## 3. Responsibilities

- **Everyone** in Temos International is responsible for his/her own professional behavior and to ensure that he/she delivers the highest standards possible, he/she must have a good understanding of the contents of this code.
- **Everyone** is expected to use the code to also guide one's behavior at all times – whether at work, online or offline.
- **CEO, leaders and management** show by personal example how the principles and standards in this code apply.
- **CEO, leaders and management** promote, support and reinforce ethical behavior at all times.
- **CEO, leaders and management** promote openness and transparency within Temos International, to the public and to all partners, customers and external contractors.
- **CEO, leaders and management** promote fairness and equality in the workplace.

### **Temos vision**

To achieve excellence in all aspects of patient management for Temos accredited partners through good governance, transparency, and continuous quality improvement, resulting in the best possible clinical care and patient experience.

Through our professional assessments, we want to achieve that Temos accredited healthcare facilities are:

- Preferred by patients for the safety and quality assurance of their environment
- Recommended by patients to their families and friends
- Preferred by physicians for their quality work and patient services
- Preferred by payors for their clients
- Appreciated by employees as beneficial for their personal professional development

### **Temos mission**

With our Temos quality programs, we support the improvement and optimization of the quality in medical treatment and non-clinical services for domestic and international patients in hospitals and clinics worldwide with a unique, voluntary, and scientific accreditation system applied by a team of highly qualified assessors.

### **Temos corporate values**

- **Quality**  
We believe that our partners, clients and customers are entitled to quality services and products provided in the most effective way.
- **Teamwork**  
We believe that a productive, effective and efficient work environment requires teamwork, collaboration and open communication within Temos International, across organizational units and with our external contractors.
- **Respect and courtesy**  
We appreciate the contributions of each individual and encourage development of individual capabilities. Individual well-being is important for us. We gain strength from the diversity of our staff and external contractors from all over the world. Courtesy is essential in all our relationships.
- **Empowerment and improvement**  
We believe that all employees and our external contractors and partners should have the authority and support necessary to contribute effectively to our Temos continuous improvement initiative and performance.
- **Integrity, fairness and honesty**  
We promise that we always act ethically and that our behavior is honest, fair and trustful.
- **Accountability and objectivity**  
We are responsible for our decisions and actions that are based on evidence and best professional judgement.
- **Responsiveness**  
We strive to understand and be responsive to the needs of one another and the needs of those who use our services.

## 4. Temos principles and standards of professional behavior

### 4.1 Legal and regulatory compliance

Regulatory compliance is an organization's adherence to laws, regulations, guidelines, (internal) rules, and specifications relevant to its business. We at Temos International shall strive to ensure that all our activities are in compliance with applicable laws and regulations as well as cultural frameworks in the countries where we are active.

You are expected to know relevant local regulations and maintain generally accepted customs insofar as they are compatible with the principles and values in the Temos Code of Ethics.

You need to be aware that even putative minor breaches of law during an assessment, while travelling or carrying out a project for Temos International can result in major damage to our partners, customers and our organization. Violating laws or regulations may also have far-reaching consequences like legal punishment, fines or in terms of labor or penal law.

### 4.2 Conduct of business

In addition to the regulatory compliance we are committed to professional ethics for all aspects of our business and service provision. This is relevant to the conduct of every individual, the entire organization Temos International and our dealings with colleagues, assessors, external partners, contractors, suppliers and other stakeholders.

Chapter 4 summarizes our Temos corporate values which are transferred in the following to our conduct of business.

- **Quality of Temos services**

Temos stands for: Trust. effective medicine. optimized services.

Our customers are treated with respect, openness, professionalism and the willingness to cooperate. This is our everyday obligation and we must meet the highest standards of quality and integrity.

As Temos assessor you maintain your impartiality and independent judgement. Misinterpretation of findings onsite during the assessment, alteration of assessment results and any other "incidents" are to be avoided. All work, findings, ratings, and results are adequately documented. The information in our reports must be correct. Certificates that are issued must be accurate and correct.

- **Anti-corruption**

Corruption or bribery is a form of dishonest or unethical conduct by a person entrusted with a position of authority, often with the aim to acquire personal benefit.

Corruption impedes business growth, escalates costs and poses serious legal and reputational risks. It also undermines fair competition.

We are committed to fair and transparent business with zero tolerance regarding corruption and bribery. Any behavior which might cause the suspicion of corruption or bribery is forbidden. This applies in particular but is not limited to the use of irregular ways of payment.

- **Presents, special hospitality services, and others**

In many countries and cultures invitations and gifts are an expression of politeness and hospitality and are not necessarily to be understood as attempt of bribery or corruption. Experience shows that the acceptance of invitations and gifts has never led to any negative consequence nor influenced the final result of the Temos onsite assessment.

However, no presents or bonuses which (could) have the effect of or even the appearance of impacting or impairing the ability to reach an independent decision should be accepted from or given to customers or business partners.

Regardless of value, benefits must not be accepted from Temos International customers, certified partners, business contacts or persons/companies connected to them if they (could) imply as attempt of corruption or bribery.

Giving or accepting monetary gifts is prohibited under any circumstances.

In case of invitations, e.g., for dinner by the customer, the lead assessor decides in agreement with the team if the invitation can be accepted or not. The lead assessor informs the customer accordingly about the acceptance or denial.

The Temos Headquarters is available for any advice in case of uncertainty within the assessors' team.

- **Sponsorships, contributions, and others**

Temos International does not contribute towards a fund or resources of any political party, elected officials, candidates for public office or similar in Germany nor in any other country. Temos International keeps strict neutrality in any political process of any country where it operates.

Where applicable, Temos International has been offering charitable donations upholding its political neutrality.

- **Services for competitors/vendors and competition**

We treat our competitors with due respect and value their achievements for continuous quality improvement. However, Temos employees and assessors shall not perform work or render services for any competitor of Temos International unless such work or service has been identified as an allowable exception regarding a conflict of interest and approval has been provided by Temos International CEO.

Proprietary information and information that is relevant for (potential) competitors, internal data such as customer information, price lists, etc. must not be disclosed to third parties. Details are defined in the Non-Disclosure-Agreement that is signed with all assessors and regional offices.

Temos International's policy is to compete fairly and in full compliance with all applicable laws and regulations.

- **Relations with project or business partners and contractors**

The principles of this Code of Ethics also apply to our project or business partners and contractors.

Partners and contractors are well selected based on their expertise, experience, value for Temos International and their compliance with the Temos Code of Ethics. Details are described in POL\_APS\_003\_Due diligence.

- **Working environment and anti-discrimination**



We are convinced that diversity at the various levels of our organization presents an added value for Temos International. Temos International is committed to providing equal opportunities in all aspects of employment. Temos International treats all employees fairly and with respect, and will not tolerate any form of discrimination on the basis of gender, national or ethnic origin, race, religion, cultural background, sexual orientation, disability, marital status, age, political orientation or others.

Temos International is committed to protecting and advancing the health and well-being of its employees, assessors and contractors in the regional offices worldwide. The organization works to ensure a safe and healthy work environment including regular external assessments on occupational health and staff safety, trainings and other measures where applicable.

- **Protection of assets**

All Temos International personnel shall strive to preserve and protect Temos International assets by making thoughtful and effective use of resources.

Internal guidelines and procedures ensure that the Temos International assets are protected and properly used and that financial reports and records are accurate and reliable.

You are asked to share responsibility for maintaining and complying with required internal controls.

Travel expenses should be consistent with your job responsibility and Temos International needs and resources. It is Temos International policy that you should not suffer financial loss or experience financial gain as a result of your business travel.

If you have been provided with portable devices you are required to safeguard such devices from loss, theft or unauthorized use or taking of Temos International's equipment, supplies, materials or services.

- **Sustainability**

In its General Assembly on 25 September 2015 the United Nations adopted the resolution 70/1. "Transforming our world: the 2030 Agenda for Sustainable Development". 17 sustainability development goals and 169 targets were defined and agreed on considering the three dimensions of sustainable development: environmental sustainability, social sustainability and economic sustainability.

Temos International is committed to the UN sustainability goals by an engaged leadership, reduction of environmental footprint, smarter purchasing and social responsibility.

Temos International will minimize its emissions and consumption of energy and natural resources, and will pro-actively contribute to environmental protection by environmentally friendly technologies. Temos International will support employees and partners in the reduction of their personal environmental footprint.

- **Information and information technology**

Information, programs or software that are considered illegal, offensive or inappropriate must not be accessed, downloaded, used, stored or disseminated on your work computer. Further, installing software or downloading, storing, using or disseminating data or information in breach of copyright or other applicable laws is prohibited.

You are not allowed to use information in a way that may jeopardize the integrity of Temos International.

- **Temos International risk management**

The purpose of Temos International risk assessment and risk management is to identify, assess and prioritize the business and operational risks and the potential hazards in order to take appropriate measures and actions to prevent occurrence within the Temos International organization, its network including customers and Temos entities.

Through this procedure risk handling activities may be planned and invoked as needed in order to minimize, monitor, and control the probability and/or impact of unfortunate events that might affect Temos International and its entities' operations or to maximize the realization of opportunities.

Since Temos International business - by offering accreditation services and training - is built on trust and long-term relationships with its partners, there is a close relation between internal infrastructure, service quality as well as monitoring of respective risks and reputational risks and marketplace risks.

The goal of Temos International risk management is to find and further improve the best methodology and control mechanisms to reduce high level risks with the given, affordable, and possible resources.

The Temos International understanding of a proper risk management includes a risk-aware culture to be kept within the organization and a proper control and monitoring environment under the supervision of the Temos International CEO.

### **4.3 Confidentiality**

When taking up work with Temos International all employees, assessors and regional office contractors are required to sign a Non-Disclosure-Agreement (NDA) covering both, the term of employment/partnership/cooperation time and afterwards. You must comply with applicable laws and confidentiality obligations. Company secrets, data, employee and financial information or otherwise sensitive information (including information about/from customers) must always be handled in a manner that protects the interests of Temos International and its partners and customers.

All individual personally identifiable information, including personal identifiers of Temos International employees, customers, partners, and patients will be kept confidential except where release is authorized.

### **4.4 Conflicts of interest**

A conflict of interest is a situation that has the potential to undermine the impartiality of a person because of the possibility of a clash between the person's (financial) self-interest and professional or public interest.

All Temos International employees including the management, assessors and contracted partners in the regional offices may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization.

Temos International must avoid any conflict of interest and any combination of roles and services that could be perceived as representing a threat to the impartiality and independence that are the basis of our services. This includes the rule that our partners in the regional offices who are

also acting as Temos assessors are not allowed to carry out Temos International assessments in their own country. Pre-surveys, preparational support and general consultancy are possible in agreement with the Temos International HQ.

Any Temos International assessor who accompanied an applying organization during the preparation by means of consultancy cannot be a member of the assessors' team for the onsite validation visit.

Further details are more specifically addressed in policies, agreements and contracts.

## **5. Breaches of the Code of Ethics**

Violations of the code may result in disciplinary procedures, including termination of employment or contract, as well as potential legal prosecution.

If needed, you are required to cooperate in good faith with internal investigations relating to this Code of Ethics.

## **6. Reporting of misconduct**

We follow and encourage an open communication and interaction within Temos International and with our external partners and contractors; openness and discussion about our ethical conduct is important for Temos International.

You are encouraged to report your concerns related to a possible violation of the Code of Ethics as well as any other violation of regulations or our company policies.

Serious violations such as possible cases of corruption and bribery must be reported immediately.

You may report your concerns directly to the Temos International CEO, Dr. Claudia Mika. Your report will be treated anonymously at your request.

Reported violations will be investigated and clarified with the support of the operational management and customer care team and in close cooperation with the Temos Boards where applicable.

If a concern is expressed relating to a possible violation of the Code of Ethics in good faith to sources inside or designated by Temos International, Temos International will not permit retaliation in any form.

## **7. Questions**

If you have any questions about the content of this Code of Ethics, please contact the Temos International CEO, Dr. Claudia Mika.

Note: This document – always in its current version – is available in the Temos International Quality Management System, accessible via “My Temos” for assessors and the partners from our regional offices, and published on the Temos website.