

Code of Conduct

Habach, 08. Oktober 2018



Contents

Mission Statement	4
Our Principles	5
Behaviour in the business environment	6
Behaviour within society	8
Corporate communications.....	9
Handling information and other assets	10
Fairness and diversity	12
Responsibility in the workplace.....	13
Compliance with the TRIGA-S Code of Conduct	13



Dear employees,

Our mission statement describes which values we share and how we want to work together - today and in the future. By adhering to our Code of Conduct, we will also achieve the goal of securing our corporate success in the long term.

"We are TRIGA-S" - only together can we achieve our goal. Our values such as personal responsibility, openness and transparency as well as ethically correct conduct in accordance with the law at all times play a particularly important role here.

For the first time, the Code of Conduct sets out our important basic rules and principles in one document. It provides an orientation framework and is binding for each and every one of us - for management, for executives and for each and every employee. It places demands on us in our dealings together, and at the same time it is a promise to the outside world for responsible conduct towards business partners and the public.

Together we have the responsibility for the success and reputation of our company. Misconduct by individuals can cause great harm to all of us.

Read the Code of Conduct carefully and use it as a guideline for our daily work and conduct.

Sabine Radiske
Owner and Managing Director

Mission Statement

We are TRIGA-S – a CRO with high competence

Competence, diversity, commitment and innovation are the basis of our performance and will bring us closer to our goal – to be the best in our market. We create added value for customers, employees and the owner.

We master the challenges of the future

TRIGA-S stands for excellent services in clinical contract research. The requirements of our customers determine our thoughts and actions. Our success is based on our common values and goals, which are binding for everyone in the company at all times. We constantly promote our personal and professional competence through innovative further training courses. Mental freedom and the possibility of personal development are important to us. We regard criticism as an opportunity for further development.

We set ourselves the highest standards

TRIGA-S has one goal - to be the best. We act entrepreneurially, with confidence, courageously and performance-oriented. Commitment, competence and quality thinking are the basis for this. The further development of our employees is particularly important to us. Health and safety have the highest priority at our workplaces.

We live common values

TRIGA-S is a family business. For us, this means more than just the form of corporate governance, it is a sign of respectful interaction with each other. In good times as well as in difficult times, we are fully committed to the company. In our daily work we are guided by fairness, honesty and mutual trust.

We act in the interest of the company. Our dealings with each other are characterized by a high degree of collegiality, respect and openness. Our working environment offers freedom and personal responsibility. We ensure flexibility and openness in all areas. Compliance is a matter of course for us.

We assume responsibility for society. We stand by the free democratic basic order, the social market economy and the sustainable management. We live equal rights and reject discrimination of any kind. Diverse encounters enrich us. We know from experience that our company will be better if different people participate. Equal opportunities and the compatibility of career and family are important to us. Transparency, reliability and openness in internal and external communication are a matter of course for us.

Our Principles

Compliance with laws, honest and upright dealing

For us, compliance with laws and regulations is the principle of economically responsible action. Honesty guides our actions, and we use our judgement sensibly. We do not misuse our business position for personal gain, nor do we promote actions that contradict the TRIGA-S rules of conduct.

Responsible for the reputation of TRIGA-S

Every employee is also our representative and characterizes the reputation of our company through his appearance, behavior and actions. We respect the personal and cultural particularities of our business partners and their origins and focus primarily on the needs of our operational task.

Dealing with colleagues and business partners

We all contribute to a corporate culture that is characterized by openness, honesty, esteem and tolerance. The personality and dignity of each individual must be respected. As a reliable business partner we keep our promises.

Leadership

Our managers act a role models: we expect our superiors to provide the highest level of professional competence, respectful treatment, fairness and openness. They are contact persons in professional as well as private matters. In fulfilling their tasks with personnel management, they have the special responsibility to ensure that the TRIGA-S Code of Conduct is adhered to. The superior also retains responsibility when delegating tasks. Communication is always characterized by politeness, respect and trust.

Behaviour in the business environment

In the sense of a fair business relationship with customers, suppliers, service providers or other contractual partners, TRIGA-S expects from all its employees and business partners the highest performance with regard to quality and reliability as well as fair pricing.

Each delivery and service as well as all payments must have a justifiable relationship to the countervalue and be comprehensible. All facts, bookings and payments must be fully documented.

Fair business conduct

TRIGA-S conducts its business according to the highest ethical principles and complies with the applicable laws of competition law. This includes, in particular, observing prohibitions under antitrust law such as the prohibition of price agreements as well as the omission of other agreements and conduct which could adversely affect competition.

Demand and acceptance of benefits

All decisions in the company are made free of personal interests on the basis of the company's objectives. Corporate decisions serve exclusively to increase customer benefits and to achieve sustainable corporate success.

In order to maintain our independence, we may not demand, make promises or accept gifts or other gratuities, personal services or favors from business partners that exceed the value of small occasional gifts. We are prohibited from accepting favors that interfere with an objective and fair decision. In this case, the business partner must be made aware of the TRIGA-S Code of Conduct. For exceptions in justified individual cases (e.g. if the rejection of a gift would be regarded as impolite and the acceptance would not result in a conflict of interest), the management must be informed.

Immoral or corrupt practices by employees or business partners will not be tolerated. TRIGA-S strictly prohibits any participation in or toleration of bribery or any other form of corruption. Violations will not be tolerated and will result in sanctions against the persons concerned.

Every employee is required to actively participate in the implementation of the Code of Conduct in his or her area of responsibility.

Costs for expenses – in particular hospitality and gifts, for which a precise separation between business and private is not possible - must be borne by the employee himself.

Attempts by suppliers to influence employees in their decisions by offering unjustified advantages generally lead - depending on the individual case - to the termination of business relationships.

Offering and granting benefits

We shall not offer, promise, grant or authorize, directly or indirectly, any unjustified advantage to any business partner or officer.

Any offer, promise, gratuity or gift must comply with applicable laws and TRIGA-S policies. Offers, promises, gratuities and gifts may not be made if they can be construed as an attempt to bribe a business partner or officer in order to obtain business benefits.

Travel, invitations and hospitality

Without exception, trips are to be planned according to business requirements and approved by the supervisor. Invitations from business partners to business lunches or events can only be accepted if they are granted voluntarily, the acceptance serves a legitimate business purpose and takes place within the framework of normal cooperation.

Conflicts of interest

At TRIGA-S, business decisions are made exclusively in the best interest of the company. Conflicts of interest with private interests or other activities, including those of relatives or persons or organizations otherwise close to them, should be avoided from the outset. If they nevertheless occur, they must be resolved in compliance with the law and the applicable guidelines. The prerequisite for this is transparent disclosure of the conflict.

Behaviour within society

Sustainable environmental and climate protection

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for us. Both in the development and implementation of our services and in the operation of production facilities, we make sure that all the resulting effects on the environment and climate are kept to a minimum and that we thus make a positive contribution to environmental and climate protection.

Every employee bears the responsibility to treat natural resources with care and to contribute to the protection of the environment and climate through their individual conduct. This also applies to business trips.

Social commitment and political activities

In principle TRIGA-S advocates the social engagement in associations and organizations or in public functions. Within the scope of their personal commitment, every employee must ensure that the company is not involved in political campaigns or public disputes.

Corporate communications

Media, publications and public appearance

We respect the right to freedom of expression and the protection of personal rights and privacy.

Every employee is a part of and representative of TRIGA-S in the private sector. Thus we are all requested to protect the reputation of the company by our behavior and appearance in the public, above all in relation to media.

All media inquiries relating to TRIGA-S must be directed to the management. Only the management makes statements to the media.

All press releases, interviews or presentations in connection with the presentation of TRIGA-S must be approved by the management before they are published.

Donations and sponsorship

We see ourselves as an active member of society and are therefore involved in various ways. All activities in connection with TRIGA-S's donations and sponsoring commitment are planned, approved and implemented exclusively by the management.

Handling information and other assets

Information is one of the company's most valuable assets. Open, targeted and effective information sharing is critical to business success. The information at TRIGA-S, however, is confidential or legally protected, which is why the respective employment contract confidentiality obligation must be observed.

Silence in corporate matters

The affairs of the TRIGA-S shall be kept confidential. All employees who receive information based on their company affiliation that is not publicly known must treat it confidentially. They may only be passed on to employees or contractual partners who are authorized to gain knowledge of them on the basis of their tasks.

Protection of information

In the interest of the company, every employee must protect confidential company information that is only intended for a restricted group of people from unauthorized access.

Every employee is obliged to inform the management of any security deficiencies.

Data protection

The protection of personal data, in particular of employees, customers and suppliers, is of particular importance for TRIGA-S.

We only collect or process personal data if this is absolutely necessary or legally required for the fulfilment of the respective work task. No personal data may be collected or processed without the consent of the person concerned or without legal admissibility.

Responsible handling of assets

It is the duty of every employee to handle company property (e.g. furniture, equipment, company vehicles) responsibly, treat it carefully and protect it against loss, damage, misuse, theft, embezzlement or destruction. This regulation also applies to intellectual property such as trademarks, patents, copyrights and know-how. This includes business and company plans, technical knowledge, databases, product samples, drafts, business papers and reports. The production of private work in the company and the use of company equipment for private purposes are prohibited. Exceptions require the approval of the supervisor or are described in the company regulations.

Careful handling of strictly confidential business documents

All employees who have access to strictly confidential information about TRIGA-S or about a company that has a business relationship with TRIGA-S must exercise special care within the scope of their duty of confidentiality when handling business documents and information.

Reporting

TRIGA-S attaches great importance to reliability and honesty, credibility and integrity. Therefore an open and truthful reporting and communication to investors, employees, customers, business partners, the public in general and government institutions is of utmost importance. Each employee shall ensure that both internal and external reports, records and other documents are complete, accurate and timely.

Fairness and diversity

Equal opportunity

The diversity of the employees is decisive for the corporate success of TRIGA-S. TRIGA-S strives to recruit, train, retain and promote the most competent employees. Career advancement is based on skills and performance. TRIGA-S is committed to equal opportunity, fair hiring practices and anti-discrimination laws.

Human and employees' rights

TRIGA-S respects the internationally recognized human rights and supports their observance. TRIGA-S rejects any form of forced and child work in the company and with business partners. TRIGA-S promotes a working climate that permits diversity. Differences between employees are therefore appreciated and respected. Discrimination, harassment or intimidation of any kind based on race, sex, skin color, religion, nationality, age, marital status, sexual orientation, ancestry, ideology, social status or physical disability are prohibited, as they contradict the goal of respectful and fair treatment. In particular, any kind of mental or physical violence is strongly condemned. If employees believe they are exposed to discrimination or harassment, or observe or become aware of such conduct, they should report it to their supervisor and HR management.

TRIGA-S will investigate any allegations of harassment or discrimination and take appropriate action under local law.

Appropriate remuneration

The right to adequate remuneration is recognized for all employees. Remuneration and other benefits are at least in line with the respective national and local legal standards or the level of the national economic sectors/industries and regions.

Responsibility in the workplace

Occupational safety and health protection

The safety and health of our employees in the workplace is an extremely important aspect of TRIGA-S.

Occupational safety and health protection are an integral part of all operational procedures and are included in technical, economic and social considerations right from the start - right from the planning phase.

Each of our employees promotes safety and health protection in their working environment and complies with the regulations on occupational health and safety. Every manager is obliged to instruct and support his employees in the exercise of this responsibility.

The same safety standards apply to visitors of all kinds such as business partners, suppliers, customers and craftsmen as apply to our employees.

Compliance with the TRIGA-S Code of Conduct

Compliance with the TRIGA-S Code of Conduct and other applicable instructions is binding for all employees.

It is the responsibility of every supervisor to ensure that the employees assigned to him know and comply with the TRIGA-S Code of Conduct.

In case of uncertainties regarding the correct behaviour, the superior or the personnel management must be contacted. The matter will be treated confidentially.