

Code of Conduct

Sutter Medizintechnik GmbH

For more than 55 years, Sutter Medizintechnik GmbH has stood for electrosurgical medical devices of the highest precision and quality. As an owner-managed family business based in Emmendingen, Germany, we develop, manufacture, and market innovative solutions for ENT, microsurgery, and neurosurgery. With our global network, we contribute worldwide to improving and preserving life.

This high level of responsibility is reflected not only in the quality of our products but also in the way we make decisions every day. Sutter Medizintechnik is committed to acting responsibly, transparently, and ethically. We treat all people with respect and act in compliance with all applicable laws and regulations. Integrity, fairness, and reliability define our collaboration.

This Code of Conduct sets out the principles to which we, as a company, are committed. It provides guidance, establishes clear standards of behavior, and complements existing laws, internal policies, and agreements.

The extended management team, the executive management, and all shareholders of Sutter Medizintechnik fully support the principles outlined in this Code of Conduct. All employees are required to be familiar with these rules and apply them. If in doubt, we encourage open dialogue with supervisors, trusted persons, or through our secure whistleblower system.

This Code of Conduct also applies to all business partners of Sutter, including suppliers, consultants, and contractors, unless they are bound by comparable standards themselves.

Our shared responsibility is the key to trust, sustainable action, and lasting success.

With thanks for your trust and support,

A handwritten signature in black ink, appearing to read "Bert Sutter", with a stylized, flowing script.

Bert Sutter
CEO Sutter Medizintechnik GmbH

Note on Gender Equality:

For reasons of readability, only the masculine form is used in this Code of Conduct. However, the information applies equally to all genders in line with our convictions and the principles of the German General Equal Treatment Act (AGG). The use of one gender form does not imply discrimination but solely serves to improve clarity and readability.

A. Our Corporate Philosophy**Quality**

The safety of users and patients is our highest priority. At Sutter, we focus on quality across the entire value chain. Our highly skilled specialists manufacture products with the highest standards of precision and care.

Precision

Surgical procedures in ENT, neuro, and microsurgery demand utmost precision from surgeons. This same precision is reflected in the design and manufacturing of our products.

Innovation

With more than 35 active patents, we are pioneers in precision electrosurgery. Technological progress and dynamic market developments drive us to continuously advance our products. Our broad product portfolio, patented features, and innovative technologies are the result of many years of dedicated development.

Customer Focus

We collaborate closely with physicians and clinics to develop user-friendly solutions suitable for everyday use in the operating room. Numerous studies and clinical experiences confirm the safety and effectiveness of our products.

Sustainability & Social Responsibility

At Sutter Medizintechnik, social responsibility is not only reflected in our purpose—to improve the work of physicians and the lives of patients—but also deeply embedded in our corporate culture. Sustainability is equally important, implemented through our three guiding pillars: sustainable growth, ecology, and people.

B. Our Code of Conduct

I. Human Rights

We respect internationally recognized human rights, particularly the dignity of every individual, and are fully committed to fair, ethical, and lawful working conditions. We comply with the core labor standards of the International Labour Organization (ILO). Any form of child labor, forced labor, modern slavery, or exploitation is not tolerated.

We reject all forms of discrimination, regardless of ethnic origin, gender, religion or belief, disability, age, or sexual identity. We stand for diversity, fairness, and equal opportunity.

II. Fair Working Conditions & Occupational Safety

We ensure fair wages, safe working conditions, and regulated working hours. We are committed to complying with all labor laws, relevant regulations, and industry standards. We also respect the right of employees to freedom of association within the scope of applicable laws.

We protect the health of our employees through appropriate measures, training, and continuous improvement. A comprehensive occupational health management system (BGM) is in place.

III. Social Responsibility

We take our social and community responsibility seriously. Safeguarding existing jobs is a core element of our corporate identity.

Beyond this, we actively support social and cultural projects that promote the common good and contribute to sustainable societal development.

IV. Environmental Responsibility

As a healthcare company, we bear a special responsibility for protecting the environment. We are committed to sustainable and resource-efficient operations.

We minimize environmental impact wherever possible and feasible, reducing waste and emissions by applying environmentally sound processes. Protecting natural resources is an integral part of our business practices.

V. Integrity in Business Conduct

We comply with all applicable laws as our minimum standard. We are committed to honest and lawful business practices. Bribery, corruption, and unfair business practices are not tolerated. We do not offer, grant, or promise benefits to anyone - particularly government officials or healthcare professionals - in order to gain an improper advantage, influence business decisions, or secure contracts unlawfully.

We value transparency and fair cooperation with customers, partners, and authorities. Compliance with competition law, antitrust law, and international export control and sanction regulations is a matter of course.

We do not tolerate money laundering or terrorism financing. Before entering into business relationships, we conduct database screenings, particularly export control and sanction checks.

VI. Data Protection & Confidentiality

We protect all confidential information and personal data. Disclosure is only made on a legal basis or with explicit consent. Sensitive data is handled securely and responsibly. We comply with all confidentiality obligations and respect the intellectual property rights of third parties.

VII. Responsibility in the Supply Chain

We base our business on facts, reliability, and professionalism. Our actions are transparent and fair. Discrimination against suppliers or customers, including in competition, is rejected.

We expect our suppliers and business partners to comply with this Code of Conduct or commit to equivalent standards. We also expect active engagement in fair, sustainable, and lawful practices. Building long-term partnerships based on responsibility and trust is our focus.

VIII. Responsibility in Leadership

Leaders at Sutter bear special responsibility as role models. They safeguard economic success, encourage collaboration, and promote a culture of trust. They keep employees informed about important developments and assign tasks clearly. Every leader ensures compliance with the law and this Code of Conduct and reports violations immediately.

Reporting Concerns Related to the Code of Conduct

Misconduct must be addressed openly—without fear of disadvantage. If you believe that actions or decisions may not be in line with this Code of Conduct, we strongly encourage you to speak up. By doing so, you help protect the integrity and reputation of Sutter Medizintechnik, while safeguarding your own interests and those of your colleagues.

Reports may be made openly or anonymously. All reports are handled with the highest degree of confidentiality.

Supervisors, trusted persons, members of the extended management team, or the executive management are always available for this.

In addition, our anonymous whistleblower system provides a secure and discreet channel for submitting concerns, including those related to legal violations subject to fines or penalties. A confidential mailbox ensures safe and protected reporting.