

# Miltenyi Group Anti-Corruption Policy

Purpose	Scope
<p>Respect for integrity is one of the core principles that defines social responsibility within the Miltenyi group. Our high standards are a direct byproduct of the value we place on ethical business practices. As a socially responsible organization, the Miltenyi group is committed to continuously improving and maintaining policies related to management approaches in the following areas: anti-corruption, transparency, and compliance with laws.</p>	<p>This Anti-Corruption Policy applies to all employees, officers, directors, agents, consultants, contractors, and any other parties representing any Miltenyi group company worldwide. It is the responsibility of every individual within our organization to adhere to this policy, ensuring that we maintain our reputation as a trusted and ethical company.</p>

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## **1. Key Principles**

### **1.1 Zero Tolerance for Corruption**

The Miltenyi group has a zero-tolerance approach to any form of corruption, including bribery, fraud, and extortion, whether it involves a public official, a private sector company, or an individual, and whether it is direct or indirect through a third-party representative. All employees are expected to conduct their business dealings in a fair, transparent, and ethical manner by specifically also considering that public officials or health care professionals often are subject to additional rules and restrictions.

### **1.2 Compliance with Laws**

We comply with all applicable anti-corruption and anti-bribery laws (such as the German Criminal Code, the US Foreign Corrupt Practices Act, the UK Bribery Act 2010 etc.) and other relevant legislation in the countries where we operate. Violation of these laws can result in severe penalties, both for the company and the individuals involved.

### **1.3 Prohibition of Bribery, Prohibition to Accept Improper Gifts**

Offering, giving, or soliciting anything of value to improperly influence the actions of another party is strictly prohibited. This applies to interactions with public officials, customers, suppliers, and any other business partners.

Acceptable gifts, hospitality, and entertainment must be reasonable, infrequent, and must be in line with our company policies, applicable industry codes and applicable laws. They should never be given with the intention of influencing a business decision or securing an improper advantage. Whenever in doubt to align with these principles, employees shall consult with Legal department.

Accepting or receiving improper gifts or items of value, for instance from suppliers, vendors or other contract partners, is prohibited. Any such acceptance of an improper gift or item of value may constitute participation in bribery or lead to a conflict of interest. If in any doubt, employees shall consult with Legal department.

### **1.4 Conflict of Interest**

Employees must avoid situations where personal interests could conflict with the interests of a company of the Miltenyi group. Any potential conflicts should be disclosed to management to ensure transparency and avoid any undue influence on business decisions.

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In case of doubt or unclear situations, the approval of or consultation with the line manager and Legal department is to be obtained.

### **1.5 Due Diligence on Third Parties**

We conduct thorough due diligence on third parties, including suppliers, distributors, and other cooperation partners to ensure they share our commitment to anti-corruption. We expect our partners to uphold the same ethical standards and comply with all relevant laws.

Where necessary, anti-corruption clauses are agreed in contracts with third parties and third-party relationships are monitored for compliance.

### **1.6 Facilitation Payments**

Any form of facilitation payments, also known as 'grease payments', often appearing as small payments made to expedite routine governmental actions, are strictly prohibited under our policy, regardless of local practices or customs. Any request for facilitation payments must be reported in accordance with the reporting principles set forth in this policy below.

### **1.7 Activities or Agreements with Potentially Higher Risk**

In some areas or in the context of certain agreements with third parties, there may be an increased risk of potentially impermissible agreements or activities or those that may be perceived to be impermissible. This can be the case, for example, in the context of political contributions, consulting arrangements or in the context of funding or sponsorship arrangements.

Any political support or contribution whether of monetary or non-monetary nature made by or on behalf of the Miltenyi group to public officials, for instance to support political parties or political initiatives, must be made in full transparency, must adhere to applicable laws and applicable industry codes and to this policy. This also applies to all lobbying activities made by or on behalf of the Miltenyi group.

Consulting arrangements of any kind, including, for example, speaking engagements, may only be entered into if there is a legitimate business need for them, the compensation does not exceed fair market value, the arrangement is permissible under applicable law and applicable industry codes and the arrangement complies with this policy.

Funding or sponsorship arrangements may only be entered into if there is a legitimate business need or purpose for them, they are of a reasonable value, the arrangement is permissible under applicable law and applicable industry codes and the arrangement complies with this policy.

In case of doubt or unclear situations, the approval of or consultation with the line manager and Legal department is to be obtained.

## **1.8 Reporting**

Employees shall immediately report any concerns or suspicions of corruption using our established reporting channels, through the internal [Speakup](#) page or by emailing our Human Rights officer at [humanrights@miltenyi.com](mailto:humanrights@miltenyi.com) or contacting Legal department. All reports will be treated confidentially, and there will be no retaliation against employees or third parties who report concerns in good faith.

## **1.9 Training and Awareness, Review**

Regular training on anti-corruption laws and practices is provided for all relevant employees. This ensures that everyone is aware of their responsibilities and can recognize and prevent potential corruption risks. Legal department is available for short-term consultation and clarification of individual cases, if needed.

This policy is regularly reviewed to ensure its constant actuality and that the measures implemented in accordance therewith are effective and complied with.

## **1.10 Responsibilities, Consequences of Non-Compliance**

This policy applies to all employees of the Miltenyi group and any third-party representative acting on behalf of the Miltenyi group. Managers shall ensure that any employees directly reporting to them understand and abide by this policy.

Violations of this policy by any employee or third-party representative may result in disciplinary actions, including termination of employment or other contract, and could also lead to legal consequences.

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## 2. Conclusion

The Miltenyi group is committed to maintaining the highest level of integrity in all our business dealings. By adhering to this Anti-Corruption Policy, we protect our reputation, ensure compliance with legal requirements, and contribute to a fair and just business environment.

## 3. Policy Approval

Version	Date	Approved by
1.0	28.02.2025	Dr. Boris Stoffel (Managing Director)