

Rontis stands for values of transparency, reliability, fairness and responsible conduct of business.

CODE OF CONDUCT

Rontis // www.rontis.com
Driven by innovation

December 18, 2017





Our Code of Conduct

Our Code of Conduct defines the important standards for the reputation of the company. The reputation is only as good as the conduct of its employees. We must consider how we work together, what values are important to us, and whether we are observing the regulations and the law. All of these shape the public image of Rontis.

Most of the topics covered will be second nature to you because they are simply common sense. Nevertheless, it is important for us to reaffirm constantly our culture of social accountability, trustworthiness and obedience to the law. We are called on to observe these rules every day and in every situation. By reminding ourselves of our common values, we make ourselves aware of what we expect from each other, what kind of behaviour we will not tolerate under any circumstances.

The Board of Directors of Rontis Corporation S.A., Zug, December 18th, 2017.

Our Corporate Philosophy

Rontis stands for values of transparency, reliability, fairness and responsible conduct of business.

Every employee - notwithstanding his/her function, position or location - adheres to these values. This Code of Conduct sets forth the framework for our activities on the market, our conduct towards business partners and our compliance with the legal requirements, to the benefit of our success.

The following standards apply to all our employees. In particular, they apply where even higher standards than the applicable law or local habits in certain countries are required. Moreover, we strictly comply with specific legal requirements governing particular markets, even when they provide for restrictions beyond this Code of Conduct.

This Code of Conduct is based on the recommendations of IFPMA (International Federation of Pharmaceutical Manufacturers & Associations) and Medtech (Medical Technology) Europe.



Conduct in business

We treat public authorities as partners to ensure quality standards in our industry.

Compliance with the law

Compliance with law, rules and regulations is for us an essential basic principle of responsible business conduct. We adhere to legal prohibitions and requirements at all times, even if this involves short term business disadvantages or difficulties for the Company or individuals. Where national laws are more restrictive than the rules applying at Rontis, the national laws take precedence.

Avoiding conflicts of interest

At Rontis business decisions are made exclusively in the best interests of the Company. Any conflicts of interest with personal matters or other business or non-business activities, including those of relatives or other related parties should be avoided. Should such conflicts nevertheless occur, they must be resolved in accordance with the law and Group policies. Conflicts must be dealt with openly and transparently.

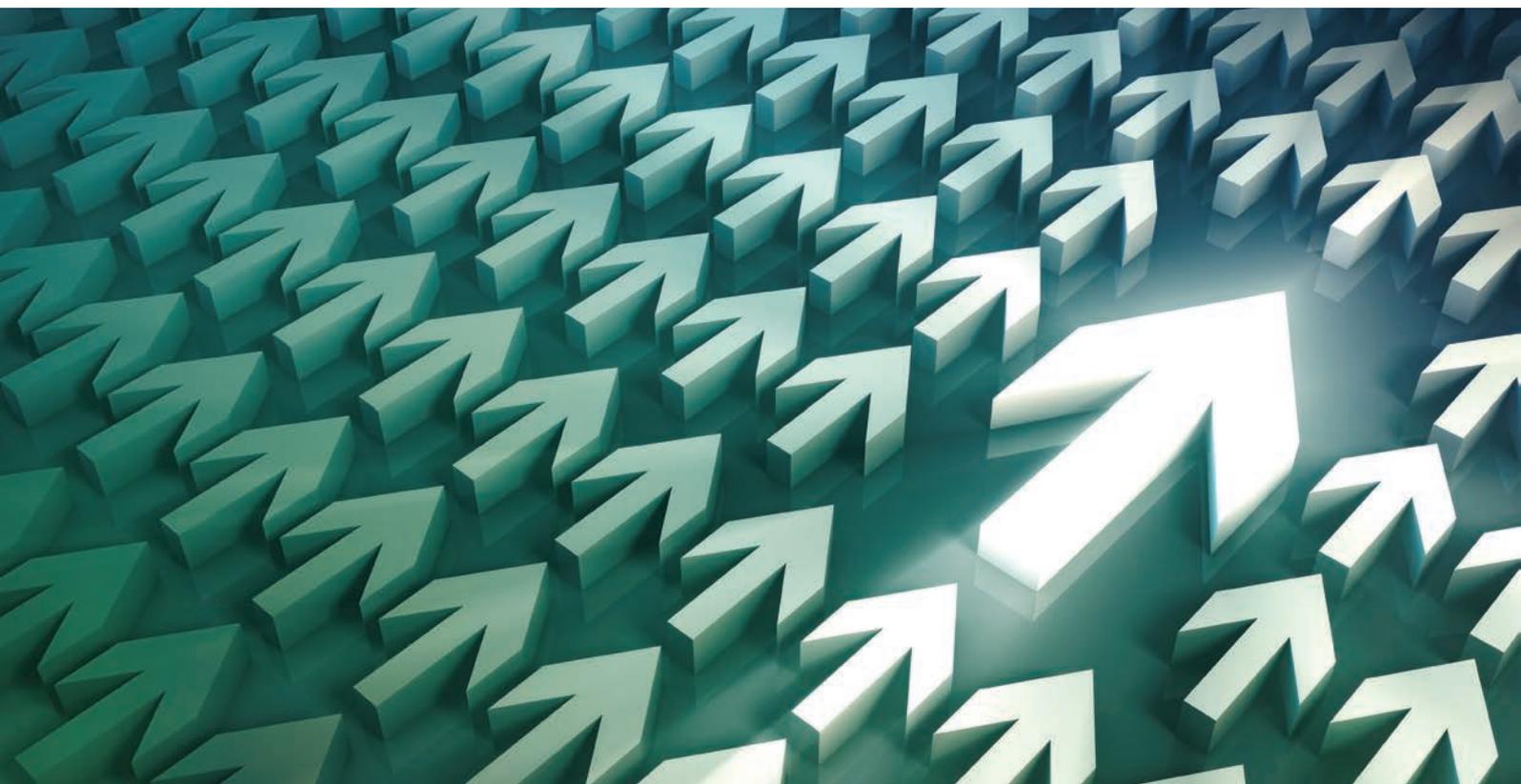
Fair Competition

Our Conduct on the market is based on the compliance commitment issued by the Executive Board of Rontis: Rontis stands for technological competency, innovation, customer orientation and motivated, responsible employees. These factors are the basis of our high reputation and the longterm economic success in global competition. Corruption and antitrust violations threaten these success factors and will not be tolerated (zero tolerance). For us, bribes and cartel agreements are not means of winning business. We would rather forgo a contract and fail to reach internal goals than act against the law.

Preventing money laundering

Rontis fulfils its legal obligations to prevent money laundering and does not participate in money laundering activities.

In cases of doubt, all employees are required to report unusual financial transactions, especially those involving cash, which could give grounds to suspect money laundering, to the Rontis Compliance Officer and/or Legal Department and/or Board of Directors.





R&D

Research and Development
investigative activities that aim at
new products or procedures in
innovations and improvement in
Market research is one of the

Conduct in Research, Development and Education

Research, development and professional education are thus of crucial importance to us. It is only by way of close collaboration with healthcare professionals and internationally recognized reference institutions that we are able to improve our products and make valuable contributions to professional education.

Project related Collaboration

Any project related collaboration with healthcare professionals or reference centres requires a written and signed agreement. Such agreements must set forth the complete purpose and scope of the project, its duration, the procedures and any kind of services and compensation. All research and development projects are billed and accounted for separately and transparently. Our projects are focusing on medical innovation and science in general and improvement of our products.

Consultancy contracts with healthcare professionals in the context of research and development adhere to the same rules. Moreover, we strictly abide to country specific statutory requirements with regards to medical consultancy. We hire qualified specialists, who professionally and actively support our projects and/or business.

Education and Training Events

We offer financial and infrastructural support for education and training events, which are of interest for medical sciences. We refrain, though, from any contributions bearing a monetary value to the participants of such events.



Conduct towards colleagues and employees

A culture of equal opportunities and mutual trust and respect is of great importance to us.

Equal treatment and non-discrimination

We promote equal opportunities and prevent discrimination in the recruitment, promotion, training and development of employees. We treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religion or world view.

Human and labor rights

We respect internationally recognized human rights and support their observance. We reject all forms of forced and child labour. We recognize the right of all employees to form unions and employee representative bodies on a democratic basis within the framework of national legislation. The right to appropriate compensation is recognized for all employees. Pay and other benefits shall at least comply with the respective national or local legal standards or the standards in the national economic sectors / industries and regions.

Occupational health and safety

The safety and health of our employees are a corporate objective of equal standing with the quality of our products and our commercial success.

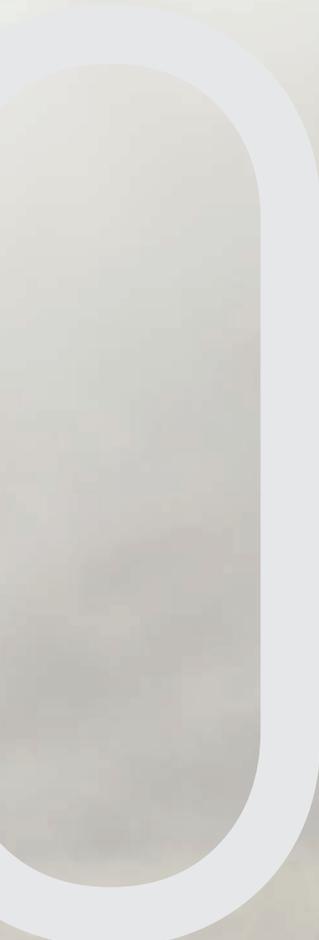
Occupational safety and health protection are an integral part of all business processes and are included from the outset – starting in the planning phase – in all technical, economic and social considerations.

All employees shall promote safety and health in their work environment and comply with the health and safety regulations. All managers are obligated to instruct and support their employees in meeting this responsibility.

Conflict of interest

Decision making should not be made according to personal interests.

It is essential that all employees disclose actual or potential conflicts of interest to their management. Newly hired personnel are requested to disclose any actual or potential conflicts of interest before they start working in Rontis.





Conduct within the Society

Rontis willingness to give back to Society

Sustainability and protection of environment and climate

For us, sustainability, environmental and climate protection and resource efficiency are key corporate objectives. When developing new products and services and when operating production equipment, we ensure that all environmental and climate impacts are kept to a minimum and our products make a positive contribution to environmental and climate protection for our customers.

Every employee bears responsibility for conserving natural resources and helping protect the environment and climate through their individual behaviour.

Donations

We regard ourselves as an active corporate citizen and demonstrate our commitment in a variety of ways. Donations and other forms of corporate citizenship are carried out solely following Rontis social responsibility.

We make no financial contributions, in particular donations or sponsorships, to political parties in our home country or abroad, organizations related or similar to parties, individual office incumbents or candidates for political offices.

Behaviour in public and communications

We respect the right to free speech and the protection of personal rights and privacy. All employees should be aware that in their private lives they can also be seen as part and representative of Rontis and are therefore called upon to safeguard the Company's standing and reputation in the way they act and conduct themselves in public, above all towards the media.





Handling of information

Rontis is built on strong values: Reliability and honesty, credibility and integrity.

Reporting

We attach great importance to being open and truthful in our reporting and communications on the Company's business transactions to shareholders, employees, customers, business partners, the general public and government institutions. Internal and external report, records and other documents of the Group comply with the applicable legal rules and standards and are therefore complete and correct at all times and issued in good time and in accordance with system requirements.

Confidential company information / inside information

We take the necessary steps to suitably protect confidential information and business documents from access and inspection by unauthorized colleagues and other third parties.

Employees of Rontis who possess concrete information about facts and circumstances not known to the public which, if it were made public, would be suitable to significantly influence the financial results of Rontis, shall not disclose on the basis of this inside information or pass on this information regardless of whether the disclosure is made deliberately or in gross disregard of the required duty of care.

Data protection and information security

The protection of personal data in particular of employees, customers and suppliers, is of particular importance to Rontis.

We collect and process personal data only when this is absolutely necessary to perform work-related tasks or when required by law. Personal data may be collected or processed only with the consent of the person concerned and where permitted by law.





Implementation and contracts

Rontis shall actively promote communication of the Rontis policies on which the Code of Conduct based. The company shall ensure that they are implemented and that no employee is disadvantaged by complying with the policies.

In their special capacity as role models, our managers have a particular responsibility to ensure that their actions measure up to the Code of Conduct. They are the first point of contact for questions on understanding the rules and must ensure that all employees know and understand the Code of Conduct. As part of their management duties they shall prevent unacceptable conduct and take suitable measures to avoid infringements of rules in their area of responsibility. Good and trusting relations between employees and managers are reflected in honest and open communication and mutual support.

Business continuity

Business continuity management is indispensable. In case of any kind of business interruption we in Rontis we'll do our best for the continuity in the supply of products and services.

Misconduct

Employees who report potential misconduct or who provide information or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliation. Misconduct is any conduct that violates the Rontis Code of Conduct and policies and/or external law or regulation. All employees are required to report potential misconduct to the attention of Rontis Compliance Officer, and/or Legal department or/and their Board of Directors.

Breaches

As Rontis abides by its values in business code of conduct and business ethic policies, requires the same from its employees.

Any breach of Rontis Code of Conduct may lead to disciplinary action up to and including termination of employment.

