

AESKU.CODE of Conduct

Verhaltenskodex der AESKU.GROUP

AESKU.INC
Oakland, CA (USA)

AESKU.BION |
AESKU.INC
Des Plaines, IL (USA)

AESKU.UK
London (UK)

AESKU.DST
Schwerin

AESKU.GROUP
Wendelsheim

AESKU.KUNSHAN
Kunshan (China)

AESKU.LATAM
Bogotá (Colombia)

AESKU.ITALY
Brunico, BZ (Italy)



AESKU.GROUP
WE TAKE CARE OF YOUR HEALTH

Dear Colleagues,

I would like to introduce and recommend the AESKU.GROUP Code of Conduct. The AESKU.GROUP consists of various companies whose mission is to research, develop and manufacture tests for diagnosis in autoimmune diagnostics, infectious serology, allergy, and food intolerance. The in-house development and manufacture of the appropriate laboratory equipment and software is also part of our portfolio. To the same extent that we are committed to people as patients, we also want the organization of our company and our business relationships to follow the rules of our Code of Conduct. AESKU.GROUP is exemplary for innovation, quality, ethical behavior, and a sense of responsibility. The Code of Conduct is addressed to our employees and business partners alike. It serves as a guideline. All are requested to internalize these rules and standards, follow them mandatorily, and communicate them to others. All who work with AESKU can address difficult situations and work out solutions together.

Fairness and integrity that is what AESKU stands for.

Dr. Torsten Matthias,

Founder and CEO AESKU



AESKU Employees

Lawful conduct, respect, honesty, and integrity.....	4
Working environment.....	5
Leadership, responsibility, and supervision.....	6

AESKU as a business partner

Export control and foreign trade	7
Compliance with standards within the supply chain	8
Product responsibility	9
Competition law/antitrust law	10
Conflicts of interest and anti-corruption	11

AESKU Information

Dealing with company secrets	12
Privacy	13
IT Security.....	14

AESKU Health

Work safety.....	15
------------------	----

AESKU Complaints and notes

Making ethical decisions, asking questions.....	16
Raise concerns and report violations.....	17

AESKU.CODE of Conduct; Implementation, applicability agreements, and recommendations of international organizations

AESKU.QUALITY – ISO 13485:2016 & ISO EN 13485:2016 – CE – FDA	18
--	-----------

AESKU Employees

Lawful conduct - respect, honesty, and integrity

Values such as honesty, commitment, and reliability are enormously important in business life—the AESKU.GROUP is characterized by the fact that these qualities are lived authentically. Here, honesty applies in word and deed, both in the relationship with our business partners and among ourselves. AESKU employs people from over twenty countries and is known for openness and respect towards all fellow human beings. Compliance with laws and observance of all legal systems of the countries AESKU.GROUP operates, is a fundamental principle of AESKU.GROUP. Each employee is obligated to observe the applicable guidelines and the legal system's laws within the framework he/she acts. All employees are expected to respect every person's dignity, privacy, and personal rights. Everyone associated with AESKU in any way is required to exercise fairness and to weigh their every move. Discrimination and intimidation of others based on ethnicity, color, religion, gender, pregnancy, sexual identity, or disability are prohibited at AESKU. All employees and business partners are subject to disciplinary consequences in the event of a violation, regardless of the sanctions provided by law, based on their obligations under the employment contract.

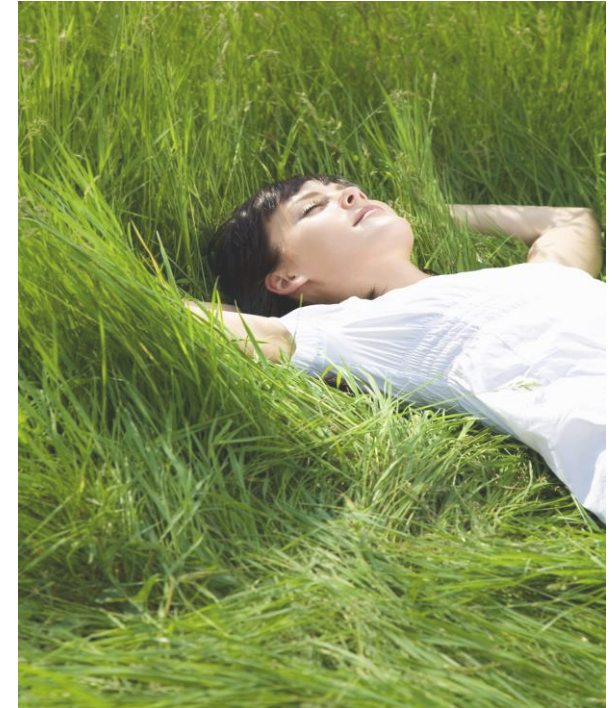
The AESKU.CODE of Conduct is intended to make it easy for every employee and business partner to familiarize themselves with the applicable rules and standards. These corporate guidelines are binding for all. AESKUGROUP refuses to enter into business contact with anyone who does not identify with this Code of Conduct.



AESKU Employees

Working environment

A significant part of AESKUGROUP's success is due to its employees. To keep it that way, AESKU will strive to create a good working environment and ensure the right work-life balance. AESKU values teamwork. Good communication and respectful interaction between employees and supervisors is the crucial component for an excellent working atmosphere. It is part of a good working relationship that supervisors are always available to their employees for professional or private questions. At AESKU, the principle of equality applies. Every employee and applicant receives the same employment opportunities. Neither forced labor nor child labor is tolerated. Mutual respect prohibits abusing authority or bullying others. Non-work-related characteristics are never the basis of an employee-related decision. Personnel decisions are made solely based on criteria such as competence, performance, and conduct on the job. AESKU supports every employee in raising concerns regarding disrespectful and unprofessional behavior or when violations of laws and company policies are identified. A good climate between employees drives innovation and excellence. Educating employees should be a high priority for a company. Therefore, AESKU has created a contact point for ideas and conceptions in this regard. The AESKU.Academy serves for knowledge transfer among colleagues. Every employee can contribute and give lectures and training about his particular field.



AESKU Employees

Leadership, responsibility, and supervision

At AESKU, responsibility begins at the top of the company. Supervisory and organizational duties are anchored in the management system, which every manager must fulfill. At the same time, every manager bears responsibility for the employees entrusted to him or her. Exemplary behavior, performance, openness, and social competence are characteristics that everyone should fulfill. In day-to-day work, it is part of the job of every manager not only to emphasize these values, the importance of ethical behavior, and compliance with guidelines through his or her personal management style, but also to make all of this a topic of discussion and to promote it in training courses. Goals that are set must be clear, ambitious, still realistic, and exemplified.

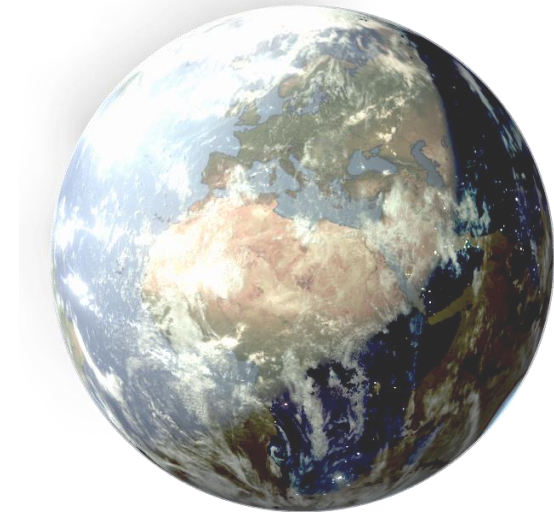
Similarly, employees are given as much freedom of action and personal responsibility as possible. Compliance with laws and AESKU guidelines always has top priority. In the event of any ambiguity, employees must consult department management immediately. The duties of managers are: Duty of selection, to decide according to professional qualifications and suitability. Obligation to instruct, according to which tasks are set precisely, thoroughly, and bindingly. Duty of control, according to which it is ensured that compliance with legal provisions is always monitored. Duty to communicate, according to which the importance of legal requirements is communicated, and violations result in disciplinary measures. The responsibility of managers in no way overrides the personal responsibility of employees.



AESKU as business partner

Export control and foreign trade

AESKU.GROUP exports to more than ninety countries. Not least because of this, it is of enormous importance for us to observe all laws of customs and foreign trade strictly. It applies in terms of national and European laws and regulations and the countries' legalities in which AESKU does business. This concerns goods and services and information exchange by e-mail, Internet, fax, or telephone. All-natural and legal persons who either already have or will have a business relationship with AESKUGROUP are regularly checked against European and US sanctions lists. Each product is reviewed in connection with the respective recipient to determine whether special permits or export licenses are required. All transactions are subject to screening for national and international restrictions, embargoed countries, or prohibited end-use. In particular, we observe the US re-export control; this is not least due to our US subsidiaries. According to the corresponding customs tariff (HS Code), all goods are classified correctly in cooperation with the respective department's technical staff. This ensures that customs and duty liabilities are calculated accurately. Participation in customs benefits programs in violation of regulations or obtaining economic advantages is strictly prohibited. Under no circumstances will a business partner in another country be aided and abetted in illegal conduct. In cooperation with the Trade Compliance Department, adherence to these principles is intended to make an essential contribution to international peace and security. Here, too, the principle applies of contacting the responsible authorities at any time in the event of questions or uncertainties.



AESKU as business partner

Compliance with standards within the supply *chain*

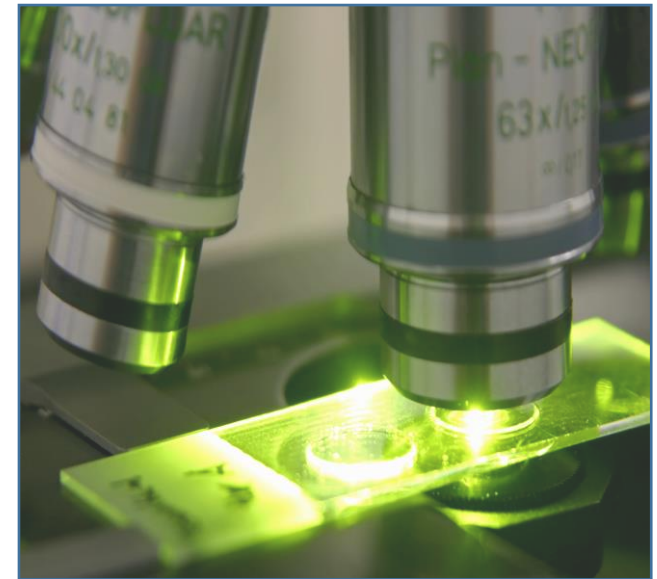
AESKU.GROUP obtains raw materials and components worldwide. The overriding goal is to protect the supply chains' stability and always offer the customer the best possible products in optimal quality. With a meanwhile unmanageable number of companies, ensuring the best possible supply is a milestone of our success. Our business partners are committed to conducting business with integrity and legal certainty. Elementary criteria in selecting our business partners are reliability in compliance with all law areas, from labor law to applicable environmental and occupational health and safety laws, anti-bribery and corruption laws, and international trade law—the AESKU.GROUP trade network consists exclusively of suppliers and distributors that meet strict standards. Only ISO-certified traders are considered. Otherwise, potential suppliers must fill out a self-assessment questionnaire, based on which they are then classified. AESKU verifies that they are qualified and able to meet applicable physical security requirements. Before purchasing any materials, products, or components, in-house approval is obtained by knowledgeable staff. This process guarantees that only high-quality products and services are provided to AESKU.GROUP customers. Every order is based on a profound supply contract. Both parties must resolve any conflicts of interest before the order is placed. As a matter of principle, non-disclosure agreements are concluded to protect personal data and company information.



AESKU as business partner

Product responsibility

AESKU.GROUP products in autoimmune diseases, allergies, and food intolerances have people as their target. Their highest good is health. AESKU.GROUP has made it their business to protect this good with its products. Since all products and a large part of the raw materials for these products are manufactured in-house, AESKU can guarantee their safety and best possible quality. As a medical device manufacturer, AESKU complies with all relevant regulations' legal requirements, especially the MPG. AESKU is certified according to ISO 13485:2016, EN ISO 13485:2016, and participates in the MDSAP program. For continuous development, AESKU invests a considerable part of its capital in ongoing up-to-date research and development and optimizes products already on the market. AESKU has a vast network of renowned scientists all over the world. The complete product life cycle from one source - from research and development to production, marketing, use, and disposal - has the advantage that AESKU can take preventive measures at any time. Those preventative measures happen as soon as potential health or environmental risk could arise in connection with the products. Every employee is encouraged to approach his or her supervisor even if there is the slightest concern. It is the only way prevention can work. In addition to the national requirements for placing its products on the market, AESKUGROUP strictly observes all the countries' needs to which it exports. Qualified employees from different countries are employed in the responsible departments. Thus, those employees can bridge language barriers quickly, and they can record country-specific customs in a short time.



AESKU as business partner

Competition law/antitrust law

In a free-market economy, fair competition is an essential requirement. Therefore, each employee is obliged to comply with the competition laws of each country. AESKU never participates in agreements between competitors that restrict competition, such as cartels or those with sham bids. AESKU does not have any business relations with companies that want to dominate a market through ruinous competition, gagging contracts, or price-fixing. Because competition and antitrust laws are very complex, legal and, compliance departments must be involved in developing new trading opportunities. Critical consideration should be given to agreements of any form concerning: Submitting bids with a purpose other than to win the business in question Restricting pricing or sharing markets and setting specific terms for controlling resale prices Colluding with competitors not to compete, restricting relationships with suppliers, and submitting sham bid Communicating with competitors about prices, inventory levels, market share, sales conditions, profit margins, or distribution methods is prohibited. If an employee becomes aware of this, the receipt of such information must be denied, and the incident reported. Obtaining competitive information through industrial espionage, bribery, theft, or eavesdropping is strictly prohibited and sanctioned. Likewise, no false information about competitors or their products may be knowingly disseminated.



AESKU as business partner

Conflicts of interest and anti-corruption

Conflicts of interest arise when private interests conflict with those of the company. A conflict of interest is when there is a risk that an employee's interests or a third party will affect AESKU or our customers' interests. Employees must make all business decisions in the best interest of AESKU.GROUP. The prospect of personal gain must not influence our employees' judgment, work performance, or decisions. Employees must disclose their financial interests or interests of family members, occupied positions with competitors or distributors immediately to the supervisor. Conflicts of interest may also arise if a family member has made a significant investment in a company that competes with AESKU.GROUP.

No employee may offer, promise or grant unjustified benefits to persons of public interest associated with social activities, including monetary payments, gifts, or other services. Employees must avoid any appearance of dishonesty or impropriety. No AESKU employee may compete with the company nor take advantage of opportunities for personal gain discovered or created using company property, proprietary information, or positions. If in doubt, always consult with the Human Resources Department or supervisor.



AESKU Information

Dealing with company secrets

Confidential information and company secrets are valuable assets for any company. At AESKU, this information is manifold, not least since all products and equipment are manufactured in-house. Thus, technical documents or chemical compositions exist, which are also patented to no small extent.

Confidential information includes intellectual property such as trade secrets, patents, trademarks and copyrights, business plans, design drawings and production ideas, blueprints, databases, and records. Other confidential items include corporate strategies, current and potential transactions, pending contracts, new product ideas, financial data, salary information, or research results.

If there is any suspicion that third-party information is being disclosed or offered without authorization, the employee must seek further instructions.

If AESKU employees own confidential information, it must not be disclosed to any third party unless they are made aware of the data's confidential nature. Company secrets may under no circumstances be used for personal benefit or that of related persons.

We also protect the rights of third parties and undertake to obtain information about their copyrights, especially when entering into a new business.



AESKU Information

Privacy

The topic of the GDPR is not only important for reasons of data protection per se. It is a matter of what data says about the person. One of the fundamental rights, the right of personality, must be safeguarded. In Germany, everyone has the right to determine their data and release and control its use by third parties.

At AESKU, all personal data are handled following the applicable data protection laws. Personal data includes information that third parties can use to identify a person. The same applies to the identity of corporate bodies. Increasingly, countries regulate the collection, processing, and transfer of sensitive information themselves.

Every AESKU employee must be sure which data in the respective work area belongs to personal data and must be aware of the legal and contractual restrictions on using it. All data must be secured by encryption, password protection, or storage under lock and key.

Personal data may only be released to employees if this is necessary to perform the respective tasks. Data may only be released to third parties outside the company (suppliers or dealers) if sufficient security measures are in place to protect the data.

The collection of personal data may only be used for legitimate company purposes. Data must be disposed of following the Privacy Policy as soon as it is no longer needed for the company's business purposes.

The data protection officer of AESKU is available for any queries and to clarify any ambiguities.



AESKU Information

IT Security

The use of IT-supported systems for the global exchange of information has become commonplace. These socio-technical systems have many advantages but also involve risks. IT security serves to protect against dangers and threats that could cause enormous economic damage to AESKU. Attacks on our systems could be system abuse, sabotage, espionage, fraud, and data theft.

Our security concepts are created in such a way that all company-important values are protected. For this reason, AESKU has an IT department that installed an information security management system using the most modern means so that threats are detected and averted before they arise. IT resources are of considerable importance and critical to success. They must therefore be protected with the utmost care. These technology resources include, but are not limited to, AESKU-provided laptops, PCs, smart mobile devices, or phones. All employees who work with these resources are responsible for them and are obligated to protect company assets.

If an employee doubts the authenticity of an email or unusual activity is detected while using company-owned resources, protective measures must be taken immediately; the IT department is always available. All issued devices must be kept secure and protected from unauthorized access. Theft and loss must be reported, and it is essential to protect data with passwords that are not accessible to third parties.



AESKU Health

Work safety

At AESKU, employees' health and safety are naturally a management task within employers' duty of care.

As a manufacturer and distributor of medical devices, AESKU complies, among other things, with Directive 98/24/EC on the protection of the health and safety of workers from the risks related to chemical agents at work.

Responsibility towards employees and colleagues requires the best possible precautions against accident hazards. This applies to the technical planning of workplaces, facilities and processes, safety management, and personal behavior in everyday work. The working environment at AESKU is designed with health in mind. All employees are required to pay constant attention to occupational safety.

AESKU holds regular safety briefings for all employees. Internal audits continuously ensure that workplace safety remains the daily focus of employees. We currently have 26 employees trained as first aiders who regularly attend first aid courses. The best possible first aid for any emergency is thus guaranteed.

AESKU has dynamic and movement-promoting computer workstations, which positively affect the musculoskeletal and cardiovascular systems.

Visits by an occupational physician are a matter of course at AESKU and are coordinated by the human resources department. During these visits, attention is paid to the various unique features that arise from the employee's area of responsibility, such as sufficient vaccination protection for the laboratories' employees.



AESKU.CODE of Conduct – Implementation, applicability agreements, and recommendations of international organizations

AESKU.QUALITY – ISO 13485:2016 & ISO EN 13485:2016 – CE – FDA

The management of AESKUGROUP promotes the AESKUCODE of Conduct Guidelines at all locations worldwide. Compliance with national and international laws and adherence to company policies outlined in this Code applies to all employees and all AESKUGROUP companies and is monitored regularly.

This Code was written as part of our compliance program in cooperation with the supervisors of all departments and approved by the management. This Code is to be regarded as our company's Code of Conduct. Compliance with this Code of Conduct is a condition of employment with our company, and violations may result in disciplinary consequences. It is the responsibility of managers to make employees aware of this rule and to ensure that it is understood and lived by each individual - the AESKU.CODE of Conduct is subject to ongoing review and revision to ensure that the values it contains are frequently in line with national and international legislation. The following conventions and guidelines are endorsed and promoted by AESKU: ***International Human Rights Charter, which includes the "Universal Declaration of Human Rights," the "UN Civil Covenant," and the "International Covenant on Economic, Social and Cultural Rights."*** The "European Convention for the Protection of Human Rights and Fundamental Freedoms." The Declaration of Principles for Multinational Enterprises of the "International Labour Organisation" focusing on fundamental principles and rights at work. The "OECD Guidelines for Multinational Enterprises." The "UN Convention against Corruption." The guidelines of the "BVMed - Bundesverband Medizintechnologie."

AESKU.GROUP companies are ISO certified according to ISO 13485:2016 & EN ISO 13485:2016, and AESKU also participates in the MDSAP program. All products are CE marked, and products distributed in the American market are 510K FDA cleared.

AESKU Complaints and hints

Make decisions, ask questions, raise concerns, report violations.

The AESKU.CODE of Conduct obligates employees to adhere to the highest ethical standards and to live and train accordingly.

The compliance program aims to prevent or detect violations of laws or company policies at any time. With this in mind, we can rightly claim to be a trustworthy business partner. Our compliance program is regularly reviewed and updated to meet the ever-evolving requirements in the relevant areas.

We expect each employee to comply with this Code, our company's policies. The inclusion of his or her understanding of right and wrong and the answers to the following questions are intended to provide initial guidance:

