

VISUS Code of Conduct

(As of: 01 June 2012)



Management Foreword

VISUS was established in 2000 and has grown to become an internationally active enterprise. This was made possible by competent and committed employees who have created a very special corporate culture, among other things, by professionalism, friendliness, and continuity – a culture lived daily throughout the years and the changes they have brought.

Mutual respect is the common basis of our success. We will only retain satisfied customers, a strong and positive image, a competent, committed and successful team as well as an appropriately sound and unique corporate culture if we are aware of their significance every day and act accordingly.

In the future we also aim for sustained efficiency and success, to support medical care for the benefit of the patients with IT solutions that are as secure, high-value and innovative as possible and to continue to develop the reliable cooperation with our clients and partners. These aims are inseparably bound with the way in which the sustainable and healthy corporate culture is maintained, lived, and further developed by our employees and the management. We want VISUS to continue to be a reliable employer for motivated and satisfied employees who identify with the Company, its aims and values. The most valuable and important elements of our Company are and remain the employees.

Fundamental corporate objectives

- ▶ *We want to position the Company for long-term efficiency and success.*
- ▶ *We want to assure a sustained, healthy corporate structure and culture with our employees, customers, and partners.*
- ▶ *We want to support medical care for the benefit of patients with secure, high-value and innovative IT solutions.*

Why a code of conduct?

Together VISUS employees drafted this code of conduct and undertook a commitment to it at the Strategy Workshop in February 2012. The **VISUS Code of Conduct** is intended to support and help attain the corporate objectives as well as to maintain and expand the corporate culture. The **VISUS Code of Conduct** was developed together in the Company. It applies to employees while providing information and support to partners and customers, too.

In the **VISUS Code of Conduct** VISUS employees define their binding rules of conduct and basic rules for working together with all persons employed at VISUS or its affiliates. These guidelines are intended to support every employee in complying with both legal and company requirements (e.g. EDP policy, data protection obligations, motor pool policy). All company employees are expected to orient themselves on the **VISUS Code of Conduct** and comply with it.

The **VISUS Code of Conduct** is dynamic in constitution. Experience and altered conditions should also be reflected continually and help together to regularly develop it.

Where clarification is needed and in order to avoid violations, employees and other interested parties can seek advice – also confidentially – from the **compliance officer**. The employees are also expected to communicate the **VISUS Code of Conduct** and its compliance and cultivate awareness of it among each other.

Compliance officer
compliance@visus.com

Dealing with each other

In order to maintain a successful and pleasant working environment, a respectful manner is cultivated at VISUS, characterised by consideration for others in the office, helpfulness and an attentive way of dealing with each other. This is based upon knowledge and understanding of the requirements, needs and conditions of the other employees and departments.

Problems at VISUS are discussed directly; criticism is constructive and understood in this manner and stimulates a critical attitude towards one's own actions. With this constantly respectful, open manner, the basis is created for improvements both in work and the working environment of every individual employee as well as for the community in which work is performed.

Outward presentation

Uniform external presentation and communication is important for VISUS. This reflects the internally cultivated strengths such as friendliness, respect and reliability. Our partners are also to be sensitised for this uniform presentation and communication and should be persuaded to appreciate it.

The uniform external presentation constitutes a framework and not a contradiction with the employee's individuality, which is both explicitly desired and promoted.

Personal responsibility

Personal responsibility and a view “beyond one’s own screen” are natural for VISUS employees. Defects in the environment are not only noticed but efforts are also made to remedy them.

Quality and customer satisfaction

Customer satisfaction and professional service are top priorities at VISUS. The quality of the services is of high value just as much as politeness and reliability. Customers’ ability to reach VISUS is of enormous importance to them. Therefore this is maintained at a high level, especially in support and administration.

Complaints are a “management issue” about which the responsible department head is always to be informed.

Quality orientation is not only a measure of the employee’s own action. The significance of quality-oriented action is also documented in the quality management handbook and underlined by satisfaction of recognised certifications and standards.

Quality and reliability are also expected from suppliers and partners. Therefore strict criteria are set for the selection of suppliers and partners and the selection is reviewed regularly.

Employees

No one is disadvantaged, favoured, harassed or excluded due to race, ethnic origin, gender, religion or confession, disability, age or sexual identity. Mobbing and sexual harassment are prohibited. Every employee has the right to be protected from discrimination or harassment. In cases of conflict, the **compliance officer** is to be consulted.

In order to create good working conditions and thereby enable pleasant and efficient work, VISUS furnished its employees with the best possible technical equipment, taking sensible economic aspects into account.

Training and further education

VISUS is committed to vocational and professional training. Not only is a high ratio of apprentices part of the company’s social responsibility, efforts are made also to hire those apprentices who successfully complete their training, to give them an opportunity to start in their chosen occupation and win them for the company in the long-term.

Personal responsibility and individuality are highly valued attributes. VISUS depends on the employees’ contributing their ideas and creativity and on thinking that is not harnessed or confined to narrow areas of responsibility. Promoting employee talents is a major concern. The employee’s own motivation to continue education is supported. Further education is offered regularly and employees are encouraged.

Sharing knowledge nurtures the conditions such that other trains of thought can be pursued and new ideas can emerge. The overarching exchange with each other is therefore very important and hence part of company life beyond the confines of the regular meetings.

Occupational health and safety

Every employee shares responsibility for occupational safety and health in his or her department. Works' safety and occupational safety regulations are followed appropriately. The absence of a regulation does not constitute a substitute for reasonable action. Every employee assures that diligence does not suffer from increasing routine. It is a matter of politeness to maintain an orderly and clean workplace as well as to contribute to cleanliness within the entire company.

Health aspects are given due consideration when furnishing VISUS workplaces. VISUS is supported by an external occupational safety professional, not only for compliance with legal regulations but also to assure the correct, healthy design of workplaces.

There are first aid personnel in the company who are informed immediately in the case of accidents and injuries. There are first aid boxes and fire extinguishers located throughout the firm. All employees know where they are located. VISUS allows all employees to be trained as company first aid helpers.

The **company safety** officer is always open for suggestions and questions.

VISUS fit&fun has been installed as a company-wide health management service that supports the employees in promoting their health in a variety of ways.

The risk that healthy colleagues or visitors may be infected or infect others e.g. with flu, is dealt with in a reasonable and responsible manner.

Security and protection of data and company property

Special responsibility arises when handling sensitive and specially protected customer and patient data. Confidence in the protection afforded to personal data and compliance with the law (e.g. German Federal Data Protection Act) are fundamental for the existence and success of the business. The employees have been sensitised to the significance and impact of data protection in all its facets. This means compliance with all company and statutory regulations. Confidentiality and integrity are also guaranteed in internal communications, with customers and with third parties.

The employees ensure that the data placed in their trust is not abused and that it is not given to unauthorised persons. They are obliged to secure their working materials and to plausibly document their work processes and work product.

Diligence in the confidential handling of information also applies to that of our partners and customers or the data about them in our possession.

Company data protection management guarantees the framework needed to maintain technical and organisational data protection and data security. Employees move within this framework and thus have certainty in their actions. When in doubt, employees can reassure themselves by consulting their supervisors or the data protection officer.

Data protection officer
datenschutz@visus.com

Data protection management demonstrates compliance with the law in handling of data protection – also in external relations. VISUS assures the availability and security of data through inter alia regular duplication and hardware redundancy.

Company and trade secrets

Company and trade secrets as well as confidential records about which employees obtain knowledge in the course of their employment – also through affiliates – are kept confidential even after employment has ended. It is not given to external third parties or other employees, unless these persons are concerned with the confidential matter on account of their assignment and also obliged to maintain confidentiality or the employment is duly authorised. This applies extensively, for example, in the procurement process for tendered services.

Company property includes more than material property like hardware or working materials, but also intellectual property contributed to the company by its employees, such as knowledge, ideas, source codes, solutions made, data on customers, suppliers and contracts. This may indirectly include information provided by other enterprises and institutions.

Employees are aware of the diligence due in handling company property and handle company property responsibly while conserving resources. Abuse or personal enrichment using company property is not permitted. Damage whether caused by oneself or discovered is reported to the responsible person.

Protection of company property is a continuous responsibility of employees. This pertains not only to the careful handling of facilities, furnishings, devices and materials, but also attention to protection from theft and maintenance of confidentiality. Spaces are therefore to be protected against unauthorised entry; EDP devices, data media and records from unauthorised access.

Lawfulness and fairness

Generally VISUS employees orient their actions on the established ethical and moral practices. This includes compliance with the law.

No benefits are rendered as means to exert influence. Rather they are given by mutual agreement; are proportionate and ought to serve the establishment and maintenance of sustainable customer relationships.

No employee is permitted to demand, accept, offer or grant, a personal advantage in connection with his professional duties, which could even appear as an attempt to gain influence. This applies esp. in the lead-up, award or processing of an order – whether with a private person, an enterprise or a government agency.

Our employees keep their private interests separated from those of the company. Business decisions are not guided by private interests and relationships. Only factual criteria are considered in business relationships with third parties and when concluding contracts.

VISUS and its employees are committed to fairness in competition. This includes the fair treatment of customers, suppliers, competitors and partners. They are treated as we ourselves would like to be treated.

Agreements or coordinated behaviour among competitors to hinder, restrict or distort competition are forbidden. These include, e.g. price fixing, allocation of regional markets and allocation of customers. Also coordinated behaviour or informal agreements that create a competitive restriction are forbidden.

Competitive agreements with supplies are also forbidden where by their very form they aim to restrict the prices and terms of business with third parties.

If employees exchange information with competitors they must assure that they provide no information that permits conclusions as to VISUS' current or future behaviour to be derived. In addition no information about clients and supplier relationships, prices and any possible changes, costs, calculations, as well as capacity and planning is disclosed.

Social responsibility and commitment

Social commitment is a permanent feature of the VISUS philosophy. The company has a long tradition of supporting, inter alia, the children's aid organisation Plan International Deutschland e.V., by collecting donations, dispensing with Christmas presents or even individual employee contributions. Other benevolent social programmes are regularly supported, also in the immediate region, by means of e.g. fund raising drives.

Demonstrated social commitment by employees is explicitly encouraged.

Environmental protection and resource conservation

Green IT is an important approach for VISUS when selecting all the equipment during its entire life cycle, from procurement to use to disposal or recycling, so as to conserve the environment and resources. Employees are careful to use energy responsibly to avoid unnecessary waste.

Resources, e.g. working materials, are used in a careful and circumspect manner. Responsible and cost-conscious action guides the use of VISUS company vehicles, business travel, and in procurement so as to avoid unnecessary expense.

Wherever possible and reasonable, VISUS also gives due consideration to the ecological and social standards when procuring goods and services. Thus careful attention is paid to the appropriate seals and certificates, resp. particular specifications (e.g. consumption and CO₂-emissions for company vehicles).

A high level of efficiency is also assured by means of modern hardware infrastructure. Available bandwidth is conserved and not burdened by unnecessary and expensive Internet use. Multiple storage of data is avoided as well as unnecessary duplication of data media.





