



Compliance Management System (CMS)

Ambulanz Mobile GmbH & Co. KG

based on DIN ISO 19600:2015

since 04/2021 ISO 37301 (certifiable for the first time as Level A standard)

contact

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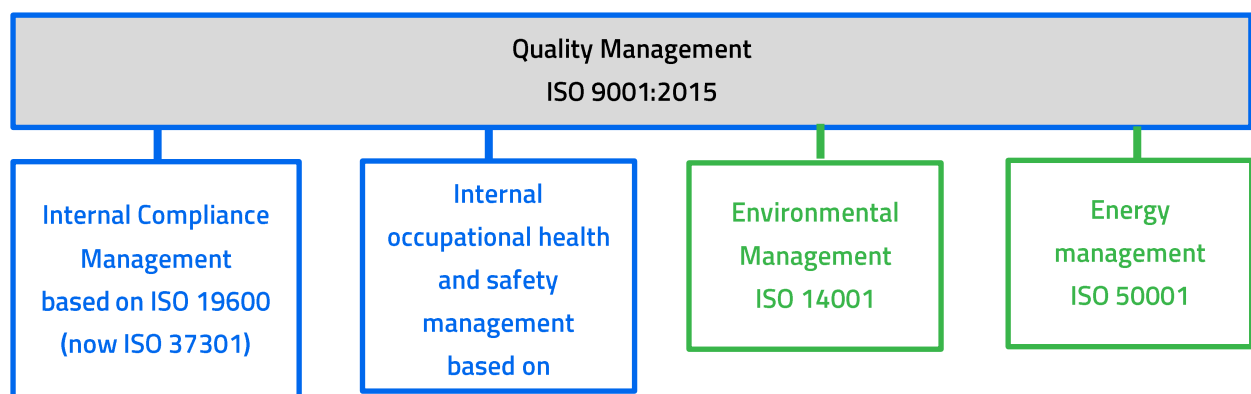
Internal Compliance Management System (CMS)

compliance organisation

For the globally operating company Ambulanz Mobile GmbH & Co KG, it is imperative to ensure integrity in compliance with national and international laws and regulations as well as internal rules.

In parallel to the existing guidelines and regulations, which have already been anchored in the company regulations, the code of conduct, the data protection guideline and the guideline on working conditions and human rights, an internal compliance management system (CMS) has been in place since 2015, which helps to support compliance with all guidelines and laws.

The aim of our Compliance Management System is to protect Ambulanz Mobile GmbH & Co KG and its employees from inappropriate and illegal behaviour. Due to the new ISO 37301 (certifiable since 04-2021), Ambulanz Mobile has made an adjustment to the CMS and is aiming for an Integrated Management System (IMS), which will consist of several sub-management systems.



Ambulanz Mobile GmbH & Co KG plans to implement certification in the areas of occupational safety (ISO 45001), environmental protection and energy in 2022. In the development, manufacture and delivery of our products, we place great emphasis on safety and environmental protection, taking into account the applicable standards. Already today, the effects on the environment are considered in the project development phases.

The point of environmental protection is also anchored as a medium to long-term quality goal in the QM manual, as well as in the Agenda 2030 and is an important part of our processes. The certification according to ISO14001 is therefore a logical consequence for us.

Relevant regulations regarding occupational safety and health protection at the workplace must be observed and complied with without exception. Special responsibility lies with the respective managers. Ambulanz Mobile expects its managers, employees and business partners to comply with

applicable laws, industry codes and organisational standards - as well as corporate governance principles of best practice, ethics and social expectations. Ambulance Mobile management fully supports all activities and efforts to ensure integrity and compliance with all laws. Violations and non-compliance may result in employment consequences and other legal consequences, subject to proportionality.

It is not only a matter of complying with all applicable rules and laws, but also of the corresponding inner attitude. It is precisely this inner attitude and special attention to the applicable national and international rules and laws that we demand from our managers, employees and business partners.

management responsibility

Figure 1 Management



Hans-Jürgen Schwarz (Managing Director/CEO), Dagmar Schwarz (Commercial Director), Frank Lundershausen (Head of Sales, Member of the Management Board), from right to left

The most important basic element of our CMS is acting "tone from the top", which means that managers support the CMS inside and outside the company, exemplify the requirements and communicate them to employees. Managers are responsible for ensuring that the compliance guidelines are adhered to in their respective areas of responsibility and for raising awareness of compliance risks among employees.



Sabine Höpfner (Managing Director)

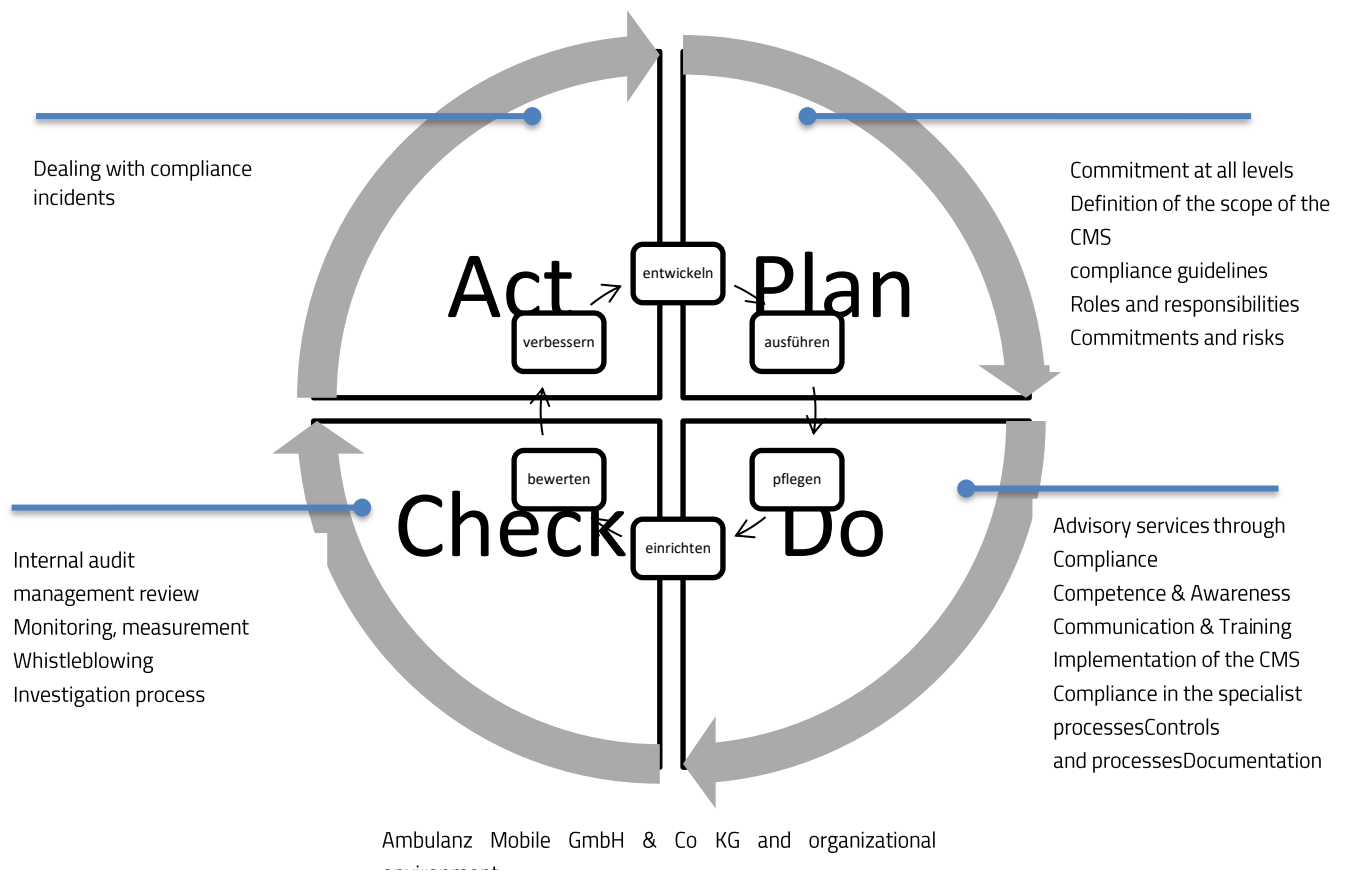


Karsten Albrecht (Technical Managing Director)

In summary, the internal CMS of Ambulanz Mobile consists of the following elements:

- Compliance organization
- Risk identification and assessment
- Principles and guidelines of conduct
- Business partner due diligence
- Compliance Communication & Training
- Integration into HR processes
- Control measures

Figure 2 Plan-Do-Check-Act cycle of ISO 37301



Risk identification and assessment

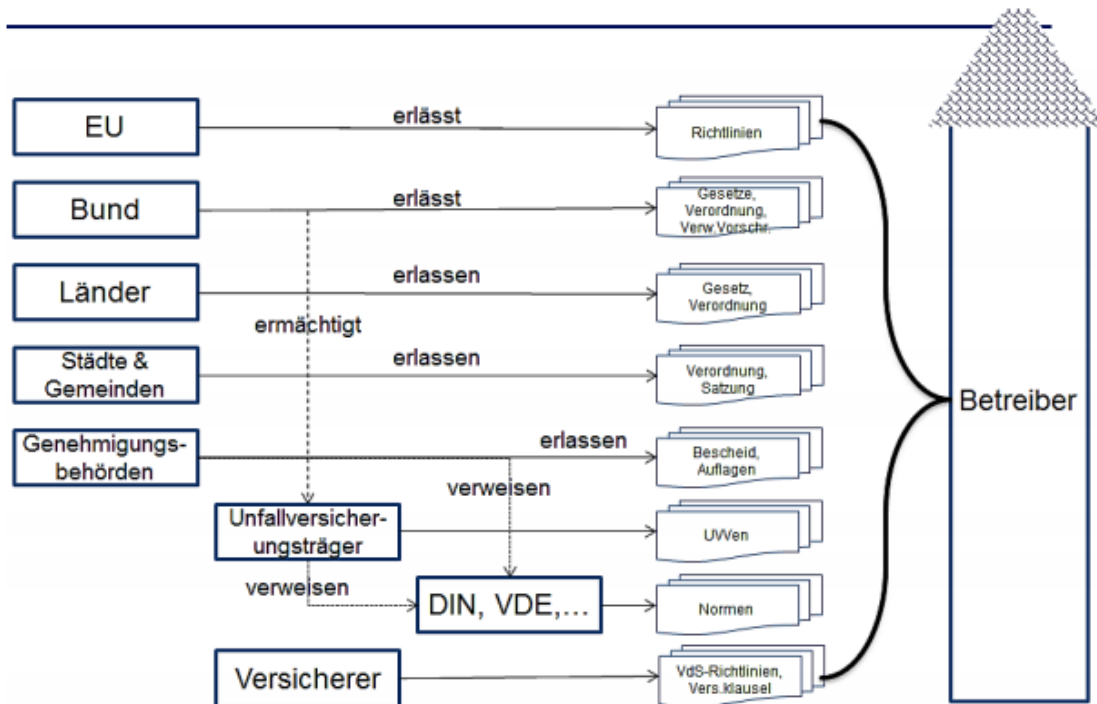
Objectives

- Avoidance and minimization of economic, legal and reputational damage
- Securing the existence of the company
- Early warning system
- Create awareness and attention for dangers and opportunities arising from business activities Efficient and sensible use of resources (personnel, financial)
- Focus on the 'right' compliance risks

The maintenance of a legal register is a building block for a successful risk assessment and one of the prerequisites for the compliance management system according to ISO 37301.

In addition to the reduction of entrepreneurial risk, the compliance management system requires documented information that all relevant regulations, legal obligations and other requirements are recognized and fulfilled within the company.

Figure 3 The legal cadastre as an organisational duty, source: IHK Hochrhein-Bodensee



At this stage, the legal register is being used via www.umwelt-online.de and work is being done on effective duty management.

Figure 4 Legal Cadastre

The screenshot shows the 'Umwelt-Online Rechtskataster' website. The header includes the logo, version 6.1.6, and navigation links: Neuregelungen, Aktuell, BR, Rechtskataster/PM, Support, Regelwerk, Impressum / Datenschutz. The main content area is titled 'Aktualisierungen' (Updates) and shows a list of updates. The left sidebar contains a tree view of categories: Abfall (3), Allgemeines (10), Betriebssicherheit, Arbeits- u. Sozialrecht (24), Arbeitsschutz, Bodenschutz/Altlasten (1), Chemikalien (5), Corona-Regelungen, Energienutzung (6), Gefahrgut/Transport (8), Immissionsschutz (3), IT-Sicherheit (3), Lärm (2), Lebensm.&Bedarfsgegenstände (13), Naturschutz (1), Strahlenschutz (1), and Techn. Regeln (11). The main list shows three updates, each with a date (25.01.2021), a status icon, and a title. The first update is 'Immissionsschutz - Bund - BImSchG' (17.05.2013), the second is 'Chemikalien - EU - VO (EG) 1907/2006 - REACH-Verordnung' (18.12.2006), and the third is 'Lärm - Bund - BImSchG' (17.05.2013). Each update has a 'Vorschau öffnen' (Open preview) link.

Special situation "Corona" impact on CMS

Using the example of an external influencing factor, we have perceived the Corona situation, which places the entire company under great challenges. Also the binding and constantly changing obligations or official orders are not to be overlooked in Corona times.

Legislation such as the Infection Protection Act, the Occupational Health and Safety Act and the Corona Occupational Health and Safety Standard are also coming into focus at Ambulanz Mobile and influencing the CMS.

The Robert Koch Institute's almost daily communication is closely followed by the company's management - and the resulting implementation scenarios are passed on to the employees so that everyone is protected and business can continue (e.g. mouth-nose covering, distance regulation, test scenarios, no business trips, contact restrictions within the company, home office, disinfection, adjustment of working hours, etc.).)

At this point, it becomes apparent that compliance risks must always be reassessed and adapted to the current situation in order to cushion the risks of the Corona pandemic. Another risk is the non-compliance with occupational health and safety standards and hygiene regulations, the risk of infection among employees, which in the worst case can lead to the closure of a business. Here, Ambulanz Mobile was able to proactively minimize the risks through appropriate and early-acting measures and controls.

Principles and guidelines of conduct

Objectives

- Knowledge transfer on the applicable rules in business transactions
- Action orientation for our employees
- Promoting employee confidence and motivation
- Creation of trust and commitment towards the relevant stakeholders (employees, business partners, the public, etc.)

The complexity of entrepreneurial activity requires the implementation of internal principles of conduct and guidelines in order to provide managers, employees and business partners with the necessary orientation for carrying out their activities.

For this purpose, Ambulanz Mobile has made the following documents available on our homepage:

<https://www.ambulanzmobile.eu/impressum/compliance>.

- Code of Conduct
- compliance management system
- Directive on working conditions and human rights
- Environmental Directive
- Code of Conduct Suppliers and Business Partners

Business partner check

Objective

- Avoidance or reduction of legal, economic and reputational risks that may arise from a business relationship or the examination of opportunities for business cooperation with third parties.

Ambulanz Mobile conducts regular sanctions list audits to check business partners for potential risks. In cases of suspicion, an additional individual audit is carried out via an external company and an intensified media search is scheduled.

Compliance communication and training

Objectives

- Knowledge transfer and sensitization of employees
- Action orientation for employees and enabling them to implement expectations
- Establishing credibility and transparency about the company's conduct and business actions, especially vis-à-vis external stakeholders
- Detection of misconduct and maladministration

The compliance team is made up of the Managing Director, Mr. Hans-Jürgen Schwarz as the main person responsible and CEO, and Ms. Eckart-Elenberger as the compliance employee. In addition, the managers and employees contribute to the dissemination of the CMS content.

Our customers and suppliers are made aware of our codes of conduct and can also obtain information on our homepage:

<https://www.ambulanzmobile.eu/impressum/compliance>.

Indications that business partners are not adhering to the compliance guidelines are documented in the business trip report, among other things, and checked using the customer/supplier evaluation.

Regular training courses and information offerings are necessary; this is not just about communicating rules, specifications and prohibitions, but rather about empowering employees to act with integrity and self-responsibility and providing them with guidance on how to implement compliance measures in their day-to-day business. Particular attention is paid to the areas of purchasing, sales and personnel.

In order to ensure that the compliance management system is as functional as possible, a communication channel from the bottom up exists in addition to the compliance communication from

the top down. This communication channel is indispensable, especially for the detection of possible non-compliance actions in the company, but also for continuous improvement through feedback from all employees.

Suspicion of misconduct

In order to avoid legal risks, employees can contact their supervisors or the Compliance Team if they have any questions. Of course, you can also do this anonymously, either by mailbox (personnel office, canteen) or to:

Compliance Contact

Silke

Eckart-Elenbergercompliance@ambulanzmobile.deTel: 03928-4863-34731

Integration into HR¹processes

Objectives

- Avoidance of behavioural risks through careful selection of personnel
- Employee retention and promotion of employee motivation
- Creation of a value-oriented corporate culture
- Demonstrate seriousness of compliance efforts and consistency in enforcement
- Deterrence of planned actions through consistent sanctioning of misconduct

The integration of compliance into personnel processes helps to raise our employees' awareness of conduct with integrity and desirability, which increases identification among our own employees. In addition, transparent HR processes promote employee motivation and strengthen employee loyalty to the company.

At Ambulanz Mobile, all newly hired employees sign that they have read and received the CMS and Code of Conduct documents. All other employees are informed about compliance topics, depending on the department.

Control measures

Objectives

- Increasing the probability of detection of misconduct
- Prevention of misconduct due to deterrent function

¹ HR=Human Resources (Human Resources refers to the resources of a company in terms of the knowledge, skills and motivation of its employees).

- Ensuring the functionality and compliance with defined processes
- Assessment of the adequacy and functionality of the CMS

Compliance can only work if employees want to implement the measures. Control measures are intended to prevent errors and irregularities in the company. Non-compliance with the guidelines is sanctioned and can lead to the loss of the job (if proportionality is maintained).

Ambulanz Mobile attaches great importance to the control of implementation measures on the subject of compliance, so that possible misconduct can be detected at an early stage and signals to employees that violations will be detected and sanctioned (while maintaining proportionality). At the same time, the findings of the control are used to achieve corresponding innovations and thus the adaptation and improvement of the CMS.

Gifts/invitations/business lunches

Voluntarily given gifts, benefits or advertising materials from suppliers, customers or other business partners may only be accepted if the value does not **exceed 20 EUR**.

All other gifts may not be accepted and must be reported immediately to the Compliance Team. The documentation is held by the spot check by S. Eckart-Elenberger).

For gifts and benefits to suppliers, customers or other business partners, the limit is **max. 40 EUR**. Advertising materials of Ambulanz Mobile GmbH & Co. KG are not affected by the documentation.

Business meals should only be accepted if the invitation is voluntary and takes place in an appropriate and customary business setting. The invitation must demonstrably serve a legitimate business purpose and be within the scope of ordinary cooperation without compromising integrity. A more detailed determination is usually made by the supervisor.

Donations / Sponsoring

Donations are voluntary services that are provided without consideration in the form of cash or in kind to promote a tax-privileged purpose.

Controlling checks the donations and sponsorships before they are released. All donations and sponsorships are additionally documented in the assistant's office.

Sponsorship is the promotion of persons, organisations and events in the form of

The provision of money, goods and services with the purpose of promoting the company's own communication and marketing objectives. The aim of sponsoring is to draw attention to one's own company, primarily in connection with a media event.

In principle, the same applies to sponsoring as to donations:

- No dishonest advantages may be gained for Ambulanz Mobile with a sponsorship or donation and no dishonest purposes may be pursued.

- Sponsorship and donations must always be transparent
(Documentation: including identity of the recipient, purpose of the donation, reason for the sponsorship/donation).
- Sponsoring and donations must not damage the reputation of Ambulanz Mobile.
- Any sponsorship or donation must be compatible with the company's principles.

Reporting

The compliance officer prepares a compliance report at regular intervals, which is forwarded directly to the management.

The Managing Director/CEO regularly discusses compliance risks, the status of implementation of the planned measures and their effectiveness and appropriateness with the Compliance employee.

Signatures

Hans-Jürgen Schwarz
Managing Director/ CEO

Sabine Höpfner
Managing Director

Karsten Albrecht
Technical Managing Director

Frank Lundershausen
Head of Sales/ Member of the
Management

Silke Eckart-Elenberger
Compliance Employee

Thomas Madaus
Data Protection Officer