

DIE LUFTRETTER

IN ACTION FOR YOUR LIFE.

Code of Conduct for Suppliers of the
DRF Luftrettung Group



Preamble

DRF Stiftung Luftrettung gemeinnützige GmbH and all companies of the DRF Luftrettung Group (hereinafter generally referred to as "DRF Luftrettung") have committed themselves to sustainable, integrity-minded and responsible business practices and a corporate management targeted at the creation of long-term value in accordance with the applicable requirements and regulations. Maintaining these principles in dealing with our employees, business partners, suppliers and the public represents an indispensable and essential element of the corporate culture and philosophy of DRF Luftrettung.

The DRF Luftrettung Group comprises the following companies:

- ▶ DRF Stiftung Luftrettung gemeinnützige GmbH
- ▶ DRF Stiftung Luftrettung
- ▶ DRF Services GmbH
- ▶ DRF e.V. (Deutsche Rettungsflugwacht Förderverein e.V.)
- ▶ ARA Flugrettung gemeinnützige GmbH
- ▶ Northern Helicopter gemeinnützige GmbH
- ▶ DRF Akademie GmbH
- ▶ DRF Maintenance GmbH & Co. KG

1 Fundamental commitment

This Code of Conduct includes principles ensuring ecological, social and ethical behaviour (ESG standards). DRF Luftrettung is aware of its social and societal responsibility and expects business partners and suppliers (hereinafter referred to as “business partners”) to implement the provisions of this Code in their dealings with their employees, companies, subcontractors, suppliers, sub-suppliers and customers. Our business partners are free to introduce more far-reaching conduct guidelines with higher requirements for ethical action for themselves and their employees. Our business partners shall ensure that the Code of Conduct of DRF Luftrettung and the resulting obligations are recognized, supported and observed.

The ethical guidelines described in this Code of Conduct are based, in particular, on national laws and regulations such as the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG), the principles of the UN Global Compact, the conventions of the International Labour Organization (ILO), the Universal Declaration of Human Rights of the United Nations, the UN Conventions on the Rights of the Child and on the Elimination of All Forms of Discrimination against Women, and the OECD Guidelines for Multinational Enterprises. The following Articles 2 to 4 constitute minimum standards and are intended to prevent situations which may jeopardize the integrity of the companies and their employees. DRF Luftrettung observes the principles of the Global Compact and is working towards achieving these objectives in its business management.

2 Social responsibility

DRF Luftrettung and its business partners support and respect the observance of internationally recognized human rights. These include:

a.) Prohibition of child labour

The business partners of DRF Luftrettung shall reject any form of child labour and shall not maintain any relationships with business partners using child labour. The term “child” refers to any person under the legal minimum age for employees at the place where the work is performed provided that the legal age is compatible with the minimum working age established by the International Labour Organization in Convention 138 (Minimum Age for Admission to Employment). Furthermore, Convention 182 of the International Labour Organization on the Elimination of the Worst Forms of Child Labour shall be observed. Adherence to any stricter (national) regulations shall be given priority.

b.) Prohibition of forced labour and disciplinary measures

DRF Luftrettung does not tolerate any form of forced labour such as slavery, prison labour or other forms of forced labour. Our business partners shall not employ anyone against their will and shall not engage in any practices forcing employees to work or preventing them from leaving their employer. Our business partners shall not use any security forces to enforce such practices and they shall not take any disciplinary measures not permitted by law. The withholding of workers' personal identity documents is not acceptable.

c.) Wages and working hours

All employees of the business partner shall be provided with a legally valid employment contract and should be paid at least the legal minimum wage or industrial wage or a wage appropriate in the region enabling them to support themselves. Employees of the business partner shall be paid on time and on a transparent basis.

Working hours should be in line with the legal regulations or the industry standard, respectively, depending on which regulations are stricter. The maximum weekly working hours permitted by national legislation shall apply. Overtime work shall only be permitted on a voluntary basis, and measures to avoid excessive physical and mental fatigue and rest breaks shall be observed.

d.) Discrimination

DRF Luftrettung and its business partners commit themselves to counter any form of harassment, threat or intimidation, in line with the applicable law and legislation. Furthermore, business partners shall value diversity and equality of opportunities and do not accept any discrimination. This refers in particular to discrimination against employees on the grounds of gender, race, disability, ethnic or cultural origin, religion or belief, age or sexual orientation.

e.) Freedom of association and collective bargaining

Business partners shall respect their employees' right of freedom of association under the applicable legislation. This includes the formation of and membership in trade unions, collective bargaining and the right to strike. In countries where the right of freedom of assembly and collective bargaining is restricted by law, alternative ways of independent and free association and bargaining shall be provided. Measures designed to impair these rights are not acceptable.

f.) Health and safety

In addition, provisions on health and safety at the workplace shall be observed in line with legislation and the employees shall be informed and trained in this regard. Working hours shall comply with applicable laws or industry standards (ILO Conventions 1 and 14). The required permits, licences and registrations shall be in place and maintained as amended from time to time.

g.) Livelihood

Business partners shall avoid any harmful soil changes, water and air pollution, harmful noise emissions or excessive water consumption significantly impairing the natural basis for the preservation and production of food. Moreover, they shall ensure that their employees have access to drinking water or sanitary facilities.

The unlawful clearing and claiming of land or natural areas such as forests or bodies of water with the intention of taking over ownership, development or other use are prohibited if the areas concerned ensure the livelihood of any person.

h.) Conflict materials

Business partners shall ensure that they establish appropriate processes for conflict materials in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This applies, in particular, to raw materials such as tin, tantalum, gold or tungsten marketed on the world market directly or indirectly by armed groups operating in conflict areas and neighbouring countries. In specific or suspicious cases, the business partners of DRF Luftrettung shall trace the supply chain back to the origin of the material in order to ensure that the products delivered to DRF Luftrettung are free of conflict materials.

i.) Product safety

Hazardous materials, materials and substances shall be labelled and stored, transported and processed in accordance with the legal requirements. In particular, the provisions on product safety and the requirements for dangerous goods shall be observed.

3 Ecological responsibility

a.) Environmental protection

Business partners are responsible for obtaining the required certificates, permits and approvals. We expect our business partners to act in a sustainable, ecological and resource-saving manner. Business partners shall use resources efficiently, utilize environmentally friendly technologies and minimize any emissions to air, water and soil. The relevant environmental protection legislation and the international conventions on environmental standards shall be observed. Furthermore, business partners shall support environmentally aware behaviour of their employees.

b.) Transparency in the transport and value chain

In our business activities, we want to develop and improve sustainable and resource-saving procedures and processes. We expect our business partners to align their activities with the principles of a social, ethical, and long-term value chain and to use environmentally friendly materials.

c.) Handling of waste and problematic substances

Business partners shall ensure that any waste and problematic substances are disposed of or recycled in a responsible and environmentally compatible manner in accordance with the relevant provisions of the Basel Convention. The handling and disposal of chemicals and other hazardous materials such as mercury-containing products shall be carried out in accordance with the Minamata Convention. Furthermore, the ban on the production and use of certain persistent organic pollutants (POPs) shall be ensured in accordance with the Stockholm Convention.

4 Ethical responsibility

a.) Fight against corruption

Corruption and bribery undermine the principles of free and fair competition. DRF Luftrettung expects business partners to strictly comply with the legal and regulatory requirements and provisions and to refrain from any inadmissible benefits and business conduct.

In dealing with business partners and government institutions, business interests and the employees' private interests shall be strictly separated on both sides. Actions and (purchase) decisions shall be made free of any irrelevant considerations and personal interests. The applicable criminal law relating to corruption shall be complied with. Among other things, the following shall be observed:

It is not permitted to grant any personal benefits (in particular monetary benefits such as payments and loans, including the granting of smaller gifts over a longer period of time) to public officials (such as civil servants or public service employees) with the aim of gaining advantages for the company, oneself or third parties. Personal monetary benefits in return for preferential treatment in business dealings may neither be offered, promised, granted nor approved. Likewise, personal benefits of value may neither be demanded nor accepted among business partners. Business partners shall impose this obligation on their employees. In business dealings, business partners and management may not offer, promise, demand, grant or accept any gifts, payments, invitations or services which are granted with the intention of influencing a business relationship in an inadmissible manner or which involve the risk of jeopardizing the professional independence of the business partner. This is generally not the case with gifts and invitations which are within the scope of normal hospitality, custom and courtesy.

DRF Luftrettung may issue a binding guideline on the acceptance and granting of gifts and invitations to hospitality and events. Such guideline may regulate exceptions with regard to appropriate low-value and symbolic gifts, appropriate business meals and appropriate events of DRF Luftrettung and business partners (customers, suppliers). The guideline shall be transparently communicated within DRF Luftrettung and to existing and potential business partners (publication).

DRF Luftrettung will provide a contact person who can be contacted if employees and/or business partners are in a conflict of interest or are unsure whether a conflict of interest exists or may arise.

b.) Integrity

Integrity refers to the ongoing maintenance of a defined value system. These requirements shall be lived by our business partners. We expect our business partners to strictly separate personal/subjective from objective interests when making decisions.

c.) Fair and free competition

Fair and free competition is a cornerstone of a sustainable and trusting business relationship. We expect our business partners to strictly comply with the requirements and provisions of antitrust and competition law and to behave in a fair and objective manner.

In dealing with competitors, these regulations prohibit, in particular, agreements and other activities which influence prices or conditions, allocate sales territories or customers or obstruct free and open competition in an impermissible manner.

Furthermore, these regulations prohibit agreements between business partners intended to restrict a contractual partner's freedom to autonomously determine its prices and other conditions of resale (determination of price and conditions).

In view of the fact that the demarcation between prohibited cartels and permissible cooperation may be problematic, the business partner shall provide a contact person for its employees who can be contacted in case of doubt.

d.) Conflicts of interest

Conflicts of interest give rise to the risk that professional judgement or action is unduly influenced by secondary interests. As a result, decisions are no longer made on an objective and factual basis.

This may result in economic and legal damage to both employees and the company. Actions and decisions shall be free of any irrelevant considerations and personal interests in order to ensure fair competition and integrity in the transport and value chain.

e.) Data protection, information security and trade secrets

DRF Luftrettung requires its employees to observe trade and business secrets.

DRF Luftrettung also expects its business partners to handle data in a trusting manner in order to ensure that the security of information is guaranteed, and the legal and regulatory requirements are strictly observed. Data shall be protected from access by third parties with appropriate measures and may not be used in an unauthorized manner nor disclosed to third parties.

5 Implementation

The principles/requirements described in this Code of Conduct shall be observed and implemented by DRF Luftrettung and its business partners. In the event of violation of this Code, DRF Luftrettung reserves the right to take appropriate measures. This may be done by means of a self-assessment questionnaire, specific contractual clauses, risk-based audits at the suppliers' production sites or development of an appropriate action plan. Furthermore, DRF Luftrettung reserves the right to terminate or suspend the business relationship, as a final consequence, in the event of non-compliance with international principles if no measures are taken to remedy such violations or if systematic violations are identified.

DRF Luftrettung has implemented an electronic complaint system on its homepage where anonymous reports relating to violations of the principles/requirements of the Code of Conduct can be submitted.

If you find or fear any unlawful or inappropriate behaviour, please contact the Compliance Department of DRF Luftrettung at the following link ([electronic complaint system](#)).

The reports will be treated confidentially, and examined and corrective measures will be taken if required.

6 Awareness and consent

By signing this document, the business partners of DRF Luftrettung commit themselves to act responsibly and to observe the principles/requirements of this Code of Conduct. Furthermore, the business partners commit themselves to clearly communicate the content of this Code of Conduct to their employees, companies, subcontractors, suppliers, sub-suppliers and customers and to take any precautions required for implementing the requirements.

Name of company

Place, date

Signature and stamp